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BY: Maria Date: 5/3/10 /s/ MP

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BY: Maria Date: /s/

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ReScanned

BY: Maria Date: /s/

Comments about this file:

Quality Checked

INDEX OTHER ORDER NO. 28

Regulations on Blowout Prevention 20 AAC 25.035 and 20 AAC 25.036

1. ----------	Draft copies of the regulation BOPE
2. April 16, 2004	File opening to Dept of Law
3. April 16, 2004	Notice of Hearing, Affidavit of publication, e-mail Distribution list, bulk mailing
4. April 20, 2004	Approved File Opening from AGO
5. April 22, 2004	Notice of Hearing, Affidavit of publication, e-mail Distribution list, bulk mailing
6. June 8, 2004	Transcript
7. June 8, 2004	Sign In Sheet
8. June 8, 2004	E-mail from Jim Regg to file
9. June 16, 2004	Public Meeting Minutes Adopting Regulation
10. June 16, 2004	6/16/04 version of proposed regulation
11. June 18, 2004	Notice of Hearing, Affidavit of publication, e-mail Distribution list, bulk mailing
12. August 12, 2004	Public Meeting Minutes 8/11/04
13. August 19, 2004	Regulation Package submitted to AGO
14. July 14, 2004	Proposed revisions to the final regulation
15.	Background information and analysis
16. September 24, 2004	e-mail re: effective date
17. October 25, 2004	Final Regulations from the AGO Juneau
18. October 25, 2004	Post Hearing Notice

Other Order 28

State Capitol
Juneau, Alaska 99801
907.465.3520 465.5400 FAX
www.ltgov.state.ak.us

550 West 7th Ave, Suite 1700
Anchorage, Alaska 99501
907.269.7460 269.0263 FAX
Lt_Governor@gov.state.ak.us

Lieutenant Governor Loren Leman

MEMORANDUM

DATE: October 7, 2004

TO: Mike Tibbles, Regulations Contact
Department of Administration

FROM: Robert Pearson RP
Administrative Code Coordinator

SUBJECT: Permanent Filing of Regulation(s)

RE: Alaska Oil and Gas Comm.; Blowout Prevention Equipment (20 AAC 25)

Date regulation signed by Lieutenant Governor (or designee) Sep. 24, 2004

Date Regulation effective Oct. 24, 2004

Attorney General File No. 993-04-0159

Regulation will be printed in Register 172, January 2005

ATTACHMENTS

1. Signed Adoption Order/Certification of Compliance X
2. Designee's Certificate if applicable X

cc: B. J. Jordan, Dep. of Law

ORDER CERTIFYING THE CHANGES TO REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The attached three pages of regulations, dealing with blowout prevention equipment under 20 AAC 25, are hereby certified to be a correct copy of the regulation changes that the Alaska Oil and Gas Conservation Commission adopted at its August 11, 2004 public meeting, under the authority of AS 31.05.030, and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

Although no public comments were received, the Alaska Oil and Gas Conservation Commission paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

DATE: August 11, 2004
Anchorage, Alaska

John K. Norman
Chair

FILING CERTIFICATION

I, Annette Kreitzer for Loren Leman, Lieutenant Governor for the State of Alaska, certify that on September 24, 2004 at 2:53 p.m., I filed the attached regulations according to the provisions of AS 44.62.040 – 44.62.120.

Annette Kreitzer for
Lieutenant Governor Loren Leman

Effective: OCT. 24, 2004.

Register: 172, JAN. 2005

LIEUTENANT GOVERNOR
STATE OF ALASKA

FOR DELEGATION OF LIEUTENANT GOVERNOR'S AUTHORITY

I, LOREN LEMAN, LIEUTENANT GOVERNOR OF THE STATE OF ALASKA, as authorized by AS 44.19.026, designate the following state official to serve as temporary custodian of the state seal and as the officer to perform the Administrative Procedure Act filing functions and the authenticating functions of the lieutenant governor during such time as I act as governor, am absent from the State, or am otherwise unavailable at the state capital to perform these functions.

Annette Kreitzer, Chief-of-Staff, Office of the Lieutenant Governor

IN TESTIMONY WHEREOF, I have set my hand and affixed hereto the Seal of the State of Alaska, at Juneau, the Capitol,

This 9th day of December

A.D. 20 02

Loren D. Leman

LIEUTENANT GOVERNOR

P.O. Box 110015 Juneau, Alaska 99811-0015 Phone (907) 465-3520 Fax (907) 465-5400

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and, ~~unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance,~~ at time intervals not to exceed each ~~fourteen~~ 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next well bore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172)

Authority: AS 31.05.030

however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, ~~unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance~~, at time intervals not to exceed each ~~fourteen~~ 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am 10/24/2004, Register 172)

Authority: AS 31.05.030

#18

Amended Regulations Dealing with Blowout Prevention Equipment

The Alaska Oil and Gas Conservation Commission has amended its regulations dealing with blowout prevention equipment ("BOPE"), 20 AAC 25.035 and 20 AAAC 25.036. The amendments increase the maximum testing interval from seven days to 14 days, make other changes in the timing requirements for BOPE testing, and add reporting provisions relating to the use of BOPE. The Lieutenant Governor signed and filed the regulation changes on September 24, 2004, with an effective date of October 24, 2004.

For further information or to obtain a copy of the amended regulations, contact Jody Colombie at (907) 793-1221, fax (907) 276-7542, or e-mail Jody_Colombie@admin.state.ak.us.

Subject: Post Hearing Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Mon, 25 Oct 2004 10:44:34 -0800
To: undisclosed-recipients:;
BCC: Robert E Mintz <robert_mintz@law.state.ak.us>, Christine Hansen <c.hansen@iogcc.state.ok.us>, Terrie Hubble <hubbletl@bp.com>, Sondra Stewman <StewmaSD@BP.com>, Scott & Cammy Taylor <staylor@alaska.net>, stanekj <stanekj@unocal.com>, ecolaw <ecolaw@trustees.org>, roseragsdale <roseragsdale@gci.net>, trmjr1 <trmjr1@aol.com>, jbriddle <jbriddle@marathonoil.com>, rockhill <rockhill@aoga.org>, shaneg <shaneg@evergreengas.com>, jdarlington <jdarlington@forestoil.com>, nelson <knelson@petroleumnews.com>, cboddy <cboddy@usibelli.com>, Mark Dalton <mark.dalton@hdrinc.com>, Shannon Donnelly <shannon.donnelly@conocophillips.com>, "Mark P. Worcester" <mark.p.worcester@conocophillips.com>, "Jerry C. Dethlefs" <jerry.c.dethlefs@conocophillips.com>, Bob <bob@inletkeeper.org>, wdv <wdv@dnr.state.ak.us>, tjr <tjr@dnr.state.ak.us>, bbritch <bbritch@alaska.net>, mjnelson <mjnelson@purvingertz.com>, Charles O'Donnell <charles.o'donnell@veco.com>, "Randy L. Skillern" <SkilleRL@BP.com>, "Deborah J. Jones" <JonesD6@BP.com>, "Paul G. Hyatt" <hyattpg@BP.com>, "Steven R. Rossberg" <RossbeRS@BP.com>, Lois <lois@inletkeeper.org>, Dan Bross <kuacnews@kuac.org>, Gordon Pospisil <PospisG@BP.com>, "Francis S. Sommer" <SommerFS@BP.com>, Mikel Schultz <Mikel.Schultz@BP.com>, "Nick W. Glover" <GloverNW@BP.com>, "Daryl J. Kleppin" <KleppiDE@BP.com>, "Janet D. Platt" <PlattJD@BP.com>, "Rosanne M. Jacobsen" <JacobsRM@BP.com>, ddonkel <ddonkel@cfl.rr.com>, Collins Mount <collins_mount@revenue.state.ak.us>, mckay <mckay@gci.net>, Barbara F Fullmer <barbara.f.fullmer@conocophillips.com>, bocastwf <bocastwf@bp.com>, Charles Barker <barker@usgs.gov>, doug_schultze <doug_schultze@xtoenergy.com>, Hank Alford <hank.alford@exxonmobil.com>, Mark Kovac <yesno1@gci.net>, gspfoff <gspfoff@aurorapower.com>, Gregg Nady <gregg.nady@shell.com>, Fred Steece <fred.steece@state.sd.us>, rcrotty <rcrotty@ch2m.com>, jejones <jejones@aurorapower.com>, dapa <dapa@alaska.net>, jroderick <jroderick@gci.net>, eyancy <eyancy@seal-tite.net>, "James M. Ruud" <james.m.ruud@conocophillips.com>, Brit Lively <mapalaska@ak.net>, jah <jah@dnr.state.ak.us>, Kurt E Olson <kurt_olson@legis.state.ak.us>, buonoje <buonoje@bp.com>, Mark Hanley <mark_hanley@anadarko.com>, loren_leman <loren_leman@gov.state.ak.us>, Julie Houle <julie_houle@dnr.state.ak.us>, John W Katz <jwkatz@sso.org>, Suzan J Hill <suzan_hill@dec.state.ak.us>, tablerk <tablerk@unocal.com>, Brady <brady@aoga.org>, Brian Havelock <beh@dnr.state.ak.us>, bpopp <bpopp@borough.kenai.ak.us>, Jim White <jimwhite@satx.rr.com>, "John S. Haworth" <john.s.haworth@exxonmobil.com>, marty <marty@rkindustrial.com>, ghammons <ghammons@aol.com>, rmclean <rmclean@pobox.alaska.net>, mkm7200 <mkm7200@aol.com>, Brian Gillespie <ifbmg@uaa.alaska.edu>, David L Boelens <dboelens@aurorapower.com>, Todd Durkee <TDURKEE@KMG.com>, Gary Schultz <gary_schultz@dnr.state.ak.us>, Wayne Rancier <RANCIER@petro-canada.ca>, Bill Miller <Bill_Miller@xtoalaska.com>, Brandon Gagnon <bgagnon@brenalaw.com>, Paul Winslow <pmwinslow@forestoil.com>, Garry Catron <catrongr@bp.com>, Sharmaine Copeland <copelasv@bp.com>, , Kristin Dirks <kristin_dirks@dnr.state.ak.us>, Kaynell Zeman <kjzeman@marathonoil.com>, John Tower <John.Tower@eia.doe.gov>, Bill Fowler <Bill_Fowler@anadarko.COM>, Vaughn Swartz <vaughn.swartz@rbccm.com>, Scott Cranswick <scott.cranswick@mms.gov>, Brad McKim <mckimbs@BP.com>

post_hearing_notice_.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: 20 AAC 25
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Mon, 25 Oct 2004 09:43:42 -0800
To: undisclosed-recipients:;
BCC: Angela Webb <angie_webb@admin.state.ak.us>, Cynthia B Mciver <bren_mciver@admin.state.ak.us>

Please post

post_hearing_notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

#17

Office of the Attorney General
Oil, Gas & Mining Section
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501-1994
Phone: (907) 269-5255
Fax: (907) 279-8644

Fax Transmission

The information contained in this fax is confidential and/or privileged. This fax is intended to be reviewed initially by only the individual named below. If the reader of this transmittal page is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this fax or the information contained herein is prohibited. If you have received this fax in error, please immediately notify the sender by telephone and return this fax to the sender at the above address. Thank you.

To: Jodi — **Fax #:**

AOGCC

From: Rob Mintz — **Date:** 10/25

Subject: — **Pages:** 5 including cover sheet

Message:

If you do not receive all the pages or have any problems with this fax, please call for assistance at (907) 269-5255.

MEMORANDUM

State of Alaska
Department of Law

TO: John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

DATE: September 16, 2004

FILE NO.: 993-04-0159

TELEPHONE NO.: 465-3600

FROM: Steven C. Weaver
Assistant Attorney General
Legislation/Regulations Section--Juneau

SUBJECT: Regulations re: blowout prevention equipment (BOPE) (20 AAC 25.235(e)(10)-(11); 20 AAC 25.236(d), (g))

Under AS 44.62.060, we have reviewed the attached regulations changes by the Alaska Oil and Gas Conservation Commission, and approve the changes for filing by the lieutenant governor. I have reviewed this project under a specific delegation dated September 14, 2004 from the Regulations Attorney. A duplicate original of this memorandum is being furnished to the lieutenant governor, along with the three pages of regulations and the related documents.

You might wish to contact the lieutenant governor's office to confirm the filing date and effective date of the attached regulation changes.

The June 18, 2004 public notice and the August 11, 2004 certification order both state that this action is not expected to require an increased appropriation. Therefore, a fiscal note under AS 44.62.195 is not required.

In accordance with AS 44.62.125(b)(6), some corrections have been made in the regulations, as shown on the attached copy.

SCW

cc w/enc: Kevin Brooks, Deputy Commissioner & Regulations Contact
Department of Administration

Robert E. Mintz
Assistant Attorney General
Oil, Gas & Mining Section--Anchorage

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and ~~, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance,~~ at time intervals not to exceed each ~~fourteen~~ 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ___/___/_____, Register ___)

=Cafo

however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

Authority: AS 31.05.030

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, ~~unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance,~~ at time intervals not to exceed each ~~fourteen~~ (14) days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

#16

Subject: [Fwd: Re: AOGCC Regulations]
From: John Norman <john_norman@admin.state.ak.us>
Date: Fri, 24 Sep 2004 17:44:41 -0800
To: Jody J Colombie <jody_colombie@admin.state.ak.us>

for the file

-------- Original Message --------
Subject: Re: AOGCC Regulations
Date: Fri, 24 Sep 2004 15:37:32 -0800
From: Robert Pearson <robert_pearson@gov.state.ak.us>
Organization: Alaska Office of the Lieutenant Governor
To: Robert Pearson <robert_pearson@gov.state.ak.us>
CC: John K Norman <john_norman@admin.state.ak.us>, Kevin A Brooks <kevin_brooks@admin.state.ak.us>, Steven C Weaver <steve_weaver@law.state.ak.us>, Barbara A Jordan <bj_jordan@law.state.ak.us>
References:<4154AC09.1060009@gov.state.ak.us>

Correction: effective date is Oct. 24, 2004. Apologies for the error!/Robert

Robert Pearson wrote:

> The Lieutenant Governor today, Sep. 24, 2004 filed regulations from the Alaska Oil and Gas Conservation Commission re: Blowout prevention equipment (BOPE) (20 AAC 25; AG file no. 993-04-0159), effective Oct. 25, 2004, will be published in Register 172, Jan. 2005. Hard copy will follow./Robert

John K. Norman <John_Norman@admin.state.us>
Commissioner
Alaska Oil & Gas Conservation Commission

#15

Review of Historical Blowout Prevention Equipment Tests
Alaska Oil and Gas Conservation Commission
May 2004

Introduction and Background

Alaska Oil and Gas Conservation Commission ("AOGCC" or "Commission") regulation[1] requires blowout prevention equipment to be function pressure tested when installed, repaired or changed, and at least once per week thereafter. Operators in Alaska have approached the Commission in the past with the idea of extending the BOPE testing interval to 14 days based on industry studies, equipment performance, and regulatory initiatives in other areas of the U.S. and world. Specifically noted regulatory agencies with longer than 7 day testing intervals for BOPE are the Minerals Management Service (14-day interval), the Bureau of Land Management (30-day interval), and Norwegian Petroleum Safety Authority (14-day interval).[2,3,4] In the most recent case, MMS funded a comparative study to determine "if *within* fourteen day test interval will provide the same amount of safety as *within* seven day test interval." The results indicated no statistical difference in BOPE performance between the two test frequencies.[5] Despite some industry interest in the longer test cycle for drilling in Alaska, no specific Alaska BOPE test performance data has been presented to date and no concerted effort was undertaken to revise the Commission's regulations.

A 2004 initiative by the Commission investigated the idea of 14-day BOPE test frequency for development well drilling within the Prudhoe Bay and Lisburne fields. Two conservation orders (CO 516 and 517) were issued for the Prudhoe Bay and Lisburne Oil Pools. The bases for these orders were: high level of geologic control allowing the accurate prediction of subsurface pressures; few wells that will flow naturally (under-pressured oil pools); large kick tolerance based on drilling practice; and the lack of well control events. The Commission further decided to investigate extending the 14-day BOPE testing cycle to the remainder of development drilling on land within the State of Alaska in March 2004. A proposed change to Commission's statewide regulations was published for comment in April 2004.

Scope of Review

An evaluation of historical BOPE test data was deemed necessary to support the decision to change 20 AAC 25 regarding BOPE test frequency. The Commission examined all BOPE test records for years 2001-04 (through April 30, 2004). Commission inspectors witness a sufficient number of BOPE tests statewide to confirm that the test data is reasonably representative of actual BOPE operating performance. All BOPE test results have been submitted to the Commission in a consistent Microsoft Excel workbook format during this time interval, facilitating a quality assurance review before conducting any data compilation. Statistical information was developed including the number of components tested, number of failures, identification of critical component failures, and failure rates (total and critical components).

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[1] 20 AAC 25.035(e)(10); 20 AAC 25.036(d)
[2] 30 CFR 250.447(b)
[3] 43 CFR 4160
[4] Norwegian Petroleum Safety Authority Regulations, Chapter II, Section 48
[5] "Reliability of Blowout Preventers Tested Under Fourteen and Seven Day Time Intervals"; Tetrahedron, Inc.; December 1996; MMS Technology Assessment and Research Project # 253

Review Results

	2001	2002	2003	2004[6]	Totals
BOPE Tests	686	598	592	177	2053
Components Tested[7]	17150	14950	14800	4425	51325
# Failed; All Components	396	324	260	127	1107
Failure Rate; All Components	2.31%	2.17%	1.76%	2.87%	2.16%
# Failed; Critical[8] Components	81	49	67	21	218
Failure Rate; Critical Components	0.47%	0.33%	0.45%	0.47%	0.42%

Discussion

The review results demonstrate the high degree of reliability of BOPE as used in Alaska, with a failure rate of critical components less than one-half of one percent. The critical components as listed above were chosen based on well control consequence severity in the event of component failure. One possible reason for the low failure rate is an ongoing attention to preventative maintenance, Commission oversight, and the limited number of rigs and BOPE system owners used for drilling in Alaska (allowing for equipment standardization and performance data sharing among the rigs). The Commission notes that whenever failures have been identified in any of the critical components, repairs or component replacement have occurred in most instances during the test or shortly after the test failure, demonstrating a real commitment to the high level of equipment reliability and performance.

While there is no equivalent review of BOPE test data for earlier years, the Commission believes the 2001-04 results are indicative of improvements to equipment (design, materials, manufacturing, etc.) and practice compared to when regulatory requirements originally established the 7-day testing cycle. Drilling efficiency has improved such that frequent operational trips to change equipment, perform surveys, etc. are no longer routine, allowing for increased on-bottom drilling time. Many well control events can be attributed to swabbing or surging a well during an operational trip. Fewer trips represent an increased level of safety (reduction in potential for inducing a well control event) when considered in conjunction with equipment reliability/performance and BOPE redundancy.

Operator requests to delay BOPE tests have become routine in recent years. Most are attributable to improved drilling efficiency and the request represents a desire to avoid a premature trip for the sole purpose of testing. Regulatory extensions have been granted by the Commission on a case-by-case basis and represent an increasing administrative burden to track and verify operator compliance.

[6] BOPE tests through April 30, 2004
[7] Approximately 25 individual components are tested during each BOPE system test
[8] Critical components are: annular preventer, pipe rams (all), blind or blind-shear rams, and accumulator system

In the context of this review, it is important to note that the Commission has not proposed any changes to the configuration of the BOPE. An additional consideration not considered in the calculation of critical failure rate is the level of redundancy within a BOPE system, particularly regarding the critical components of the stack. Each BOPE system is composed of multiple sets of devices capable of closing an uncontrolled flow, redundant controls, numerous paths for routing returning wellbore fluids, and operational monitoring that provides early warning of a potential well control event. All this is in addition to the primary means of well control: the drilling fluid that is required to provide for an overbalance of downhole pressure while drilling.

The Commission would be remiss to not recognize there is a significant cost savings to industry associated with less frequent testing. Test results during the 3+ years evaluated indicate each BOPE test, not considering trip time, will typically take 4-8 hours to complete.[9]

Conclusion and Recommendation

Performance information presented in this review shows a very low failure rate for equipment without any consideration being given to redundancy within the BOPE system. In addition to performance, there are regulatory, safety, and economic reasons that favorably support the Commission's proposal to revise the BOPE pressure-testing interval during development drilling[10] and completion activities. As noted in the Conservation Orders for PBU and Lisburne Oil Pools, there is also a high level of geologic control associated with development drilling in Alaska. Adopting a 14-day maximum interval between BOPE tests would be consistent with other major regulatory jurisdictions such as MMS, BLM, and Norway's PSA, and more restrictive than published industry recommended practice[11] without compromising safety.

Specific recommendations:

- 20 AAC 25.035(e)(10) and .036(d) should be revised to allow a maximum 14-day BOPE pressure test interval for development drilling and completion activities;
- All other rig-related operations, including exploration drilling and workovers, should retain the 7-day test interval as currently stated in the Commission's regulations;
- There should be no need for extensions to the 14-day interval. The operator should justify any request for an extension beyond the proposed 14-day interval in writing, and Commission approval should be rare;
- Regulations should retain provisions for reverting to 7 day testing; possible reasons include poor performance, first test(s) after a rig has been stacked, unique operating circumstances
- Function testing of BOPE should continue on a 7 day cycle; this is consistent with other regulatory jurisdictions;
- The Commission should continue to track BOPE test results and compare against the 3+ years of baseline data.

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[9] AOGCC; Conservation Order 516

[10] The break between exploratory and development drilling is interpretive and solely at the Commission's discretion.

[11] API RP 53 – "Recommended Practices for Blowout Prevention Equipment Systems for Drilling Wells"; 3rd Edition, March 1997; this standard establishes weekly function testing and pressure testing at intervals not to exceed 21 days.

Appendix

BOP Test Failures: 2001 through April 30, 2004

BOP Performance: 2001 Failures

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2001 BOPE Tests											
	1/1/2001	Kenai	31-7	200-138	Inlet GD1	N	2			1	
	1/2/2001	PBU	4-41A	200-195	Nabors CDR1	N	1				
	1/3/2001	PBU	Z-101	200-162	Nabors 7ES	N	1			1	
	1/4/2001	MPU	E-24A	200-186	Nabors 22E	N	1				
	1/4/2001	PBU	K-12A	200-207	Nabors 3S	N	2				
	1/5/2001	KRU	1D-37	200-204	Nabors 16E	Scheve	2				
	1/6/2001	KRU	2N-314	200-193	Nabors 19E	Scheve	1				
	1/10/2001	PBU	4-41A	200-195	Nabors CDR1	N	2		2		
	1/11/2001	MGS	A-14LN2	200-131	Inlet XTOA	N	1				
	1/13/2001	MPU	E-24A	200-187	Nabors 22E	Crisp	1				
	1/13/2001	TBU	M-32RD	199-097	Nabors 51	Jones	5	1	1		
	1/15/2001	PBU	C-33A	200-202	Nabors CDR1	N	3				
	1/16/2001	Redoubt	1	200-165	Nabors 429	Grimaldi	5				
	1/17/2001	PBU	S-104	200-196	Nabors 9ES	Crisp	2				
	1/19/2001	MGS	A14-01	200-131	Inlet XTOA	N	2				
	1/21/2001	Niakuk	NK-43	201-001	Doyon 14	Spaulding	5			1	
	1/21/2001	MPU	E-24A	200-187	Nabors 22E	N	1				
	1/22/2001	PBU	C-33A	200-202	Nabors CDR1	Grimaldi	3		1		
	1/23/2001	Alpine	CD1-NQ1	200-215	Doyon 19	N	2				
	1/23/2001	Kenai	42-7	199-025	Inlet GD1	N	1				
	1/25/2001	TBU	K-15RD	179-034	Nabors 58	Crisp	2				
	1/26/2001	MGS	A14-01	200-131	Inlet XTOA	Jones	4				
	1/26/2001	MPU	F-81	200-066	Nabors 4ES	Scheve	2				
	1/31/2001	MPU	F-05	199-074	Nabors 4ES	N	2				
	2/1/2001	Kenai	42-7	199-024	Inlet GD1	Jones	4	1			
	2/6/2001	Palm	1	201-005	Nabors 19E	Spaulding	1				
	2/8/2001	Northstar	NS-27	201-027	Nabors 33E	Spaulding	1				
	2/11/2001	PBU	NGI-04	175-069	Nabors 9ES	Jones	2				
	2/14/2001	Alpine	CD1-21	201-006	Doyon 19	Operator	1				
	2/14/2001	Palm	1	201-005	Nabors 19E	Operator	1				
	2/14/2001	PBU	P-20B	200-159	Nabors 7ES	Grimaldi	1				
	2/15/2001	PBU	16-06A	201-008	Nabors 3S	Scheve	4			1	
	2/18/2001	WMRU	7	200-201	Nabors 160	Operator	1			1	
	2/21/2001	Alpine	CD1-21	201-006	Doyon 19	Operator	1				
	2/22/2001	Endicott	2-28A	201-018	Doyon 15	Operator	3			1	
	2/23/2001	KRU	1J-08	201-024	Nabors 16E	Crisp	1				
	2/26/2001	Kenai	24-6	200-188	Inlet GD1	Jones	2				
	2/27/2001	Northstar	NS-27	201-027	Nabors 33E	Crisp	4				
	3/4/2001	Redoubt	2	201-031	Nabors 429	Operator	1				
	3/6/2001	KRU	1L-09	190-034	Nordic 3	Operator	1				
	3/7/2001	Nigliq	1	201-036	Doyon 19	Jones	4				
	3/8/2001	Kenai	24-6	200-188	Inlet GD1	Grimaldi	1				1
	3/10/2001	Niakuk	NK-12B	201-015	Doyon 14	Scheve	1				
	3/11/2001	Trail Blazer	A	201-013	Nabors 22E	Scheve	3				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2001 BOPE Tests											
	3/11/2001	PBU	E-07A	201-034	Nabors CDR1	Grimaldi	2				
	3/12/2001	Palm	1A	201-040	Nabors 19E	Operator	1	1			
	3/13/2001	WMRU	7	201-042	Nabors 160	Crisp	1				
	3/14/2004	KRU	1L-11	190-045	Nordic 3	Operator	1	1			
	3/17/2001	Trail Blazer	A	201-013	Nabors 22E	Crisp	4				
	3/18/2001	PBU	E-07A	201-034	Nabors CDR1	Operator	1				
	3/19/2001	TBU	K-1RD	201-009	Nabors 58	Jones	2				
	3/24/2001	MPU	F-33A	201-062	Nordic 1	Jones	1				
	3/26/2001	PBU	E-07A	201-034	Nabors CDR1	Operator	1				
	3/28/2001	Nigliq	1	201-061	Doyon 19	Operator	1				
	3/29/2001	Moose's Tooth	C	201-049	Doyon 141	Scheve	1				
	3/29/2001	MPU	H-08B	201-047	Nabors 3S	Operator	1		1		
	3/31/2001	Trail Blazer	E1	201-035	Nabors 22E	Scheve	1				
	4/1/2001	Northstar	NS-29	201-041	Nabors 33E	Grimaldi	3	1			
	4/3/2001	MGS	A32-11R	193-092	Inlet 9086	Grimaldi	1				
	4/3/2001	Beaver Ck	BC-10	200-192	Inlet GD1	Jones	2				
	4/4/2001	Redoubt	2	201-031	Nabors 429	Jones	1				
	4/7/2001	MPU	L-06	190-010	Nabors 4ES	Operator	2				
	4/8/2001	Lookout	1	201-003	Nabors 14E	Spaulding	6				
	4/9/2001	PBU	F-03	201-053	Nabors CDR1	Operator	1		1		
	4/10/2001	MGS	C23-23	168-030	Inlet XTOC	Grimaldi	3				
	4/12/2001	MPU	F-73	200-198	Nordic 3	Operator	1				
	4/13/2001	Lookout	1	201-003	Nabors 14E	Operator	1				
	4/15/2001	KRU	1J-14	200-200	Nabors 16E	Spaulding	1			1	
	4/15/2001	PBU	F-03	201-053	Nabors CDR1	Operator	1		1		
	4/19/2001	Northstar	NS-29	201-041	Nabors 33E	Operator	1		1		
	4/20/2001	Lookout	1	201-003	Nabors 14E	Operator	3				
	4/22/2001	MPU	E-30A	201-011	Nabors 3S	Scheve	2	1			
	4/23/2001	KRU	2A-15	185-146	Nordic 3	Operator	1				
	4/25/2001	Endicott	3-15	187-094	Doyon 15	Operator	2				
	4/27/2001	Alpine	CD1-14	201-038	Doyon 19	Crisp	2				
	5/4/2001	MPU	J-01A	190-095	Nabors 4ES	Jones	1				
	5/9/2001	Kenai	24-5	182-098	Inlet GD1	Crisp	1				
	5/21/2001	KRU	2P-438	201-082	Doyon 141	Crisp	1				
	5/24/2001	Alpine	CD2-42	201-067	Doyon 19	Jones	1				
	5/26/2001	Kenai	24-5	182-098	Inlet GD1	Operator	2				
	5/27/2001	MPU	J-18	197-220	Nabors 4ES	Operator	1				
	5/30/2001	MGS	A23-01	201-073	Inlet XTOA	Crisp	4			1	
	6/2/2001	KRU	1C-133	201-077	Nabors 245	Scheve	4			1	
	6/2/2001	Northstar	NS-29	201-041	Nabors 33E	Operator	1		1		
	6/2/2001	PBU	02-21	201-099	Nabors 3S	Operator	1				
	6/4/2001	KRU	3K-20	201-088	Nabors 16E	Scheve	1				
	6/9/2001	MPU	C-41	201-078	Nabors 22E	Crisp	5				
	6/9/2001	Northstar	NS-27	201-027	Nabors 33E	Operator	1		1		
	6/11/2001	Redoubt	2	201-031	Nabors 429	Operator	1				
	6/12/2001	KRU	1C-121	201-080	Nabors 245	Operator	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2001 BOPE Tests											
	6/12/2001	PBU	L-01	201-072	Nabors 9ES	Operator	1			1	
	6/19/2001	Redoubt	2	201-031	Nabors 429	Operator	1	1			
	6/23/2001	PBU	K-10A	201-058	Nabors 3S	Scheve	2				
	6/26/2001	PBU	K-33	196-202	Nabors 4ES	Grimaldi	1			1	
	6/30/2001	MPU	I-04A	201-092	Nabors 3S	Operator	1		1		
	7/1/2001	Falls Ck	1	160-042	Inlet GD1	Operator	8				
	7/2/2001	Redoubt	D1	201-085	Nabors 429	Operator	1				
	7/2/2001	KRU	3K-19	201-108	Nordic 3	Crisp	6			1	
	7/5/2001	PBU	Y-15A	201-089	Nabors CDR1	Jones	1				
	7/8/2001	Northstar	NS-27	201-027	Nabors 33E	Jones	3	1			2
	7/10/2001	PBU	12-29	184-032	Doyon 16	Jones	8				
	7/10/2001	Redoubt	D1	201-085	Nabors 429	Grimaldi	2				
	7/11/2001	KRU	1C-111	201-121	Nabors 245	Operator	1				
	7/13/2001	TBU	K-18RD	201-117	Nabors 58	Crisp	2		2		
	7/15/2001	FCU	1	160-042	Inlet GD1	Grimaldi	2				
	7/16/2001	PBU	S-107	201-113	Doyon 14	Operator	2	2			
	7/16/2001	Alpine	CD2-33	201-120	Doyon 19	Scheve	1				
	7/19/2001	MPU	C-24	201-094	Nabors 22E	Grimaldi	1				
	7/19/2001	KRU	1C-123	201-084	Nabors 245	Crisp	2				
	7/24/2001	TBU	M-25	187-086	Nabors 51	Jones	4		1		1
	7/25/2001	MPU	F-86	201-087	Nabors 27E	Crisp	3				
	7/26/2001	KRU	1R-22A	199-049	Nordic 3	Operator	1				
	7/27/2001	MGS	A23-01	201-073	Inlet XTOA	Grimaldi	1		1		
	7/29/2001	MGS	A23-01	201-073	Inlet XTOA	Operator	2		1		
	8/1/2001	PBU	S-107	201-113	Doyon 14	Operator	3	1			
	8/1/2001	KRU	2N-304	201-130	Nabors 16E	Operator	1				
	8/7/2001	KRU	2N-304	201-130	Nabors 16E	Scheve	3		1		
	8/8/2001	SCU	13-34	171-021	H & R Drilling 9	Operator	1		1		
	8/9/2001	TBU	K-18RD	201-117	Nabors 58	Operator	1				
	8/11/2001	PBU	04-09	176-030	Doyon 16	Grimaldi	3		1		1
	8/13/2001	SCU	32-8	100-266	H & R Drilling 9	Operator	2				
	8/15/2001	FCU	1	201-155	Inlet GD1	Grimaldi	2				
	8/18/2001	MPU	G-14	201-133	Nabors 27E	Operator	1				
	8/18/2001	PBU	01-04A	201-152	Nabors 3S	Operator	2	1			
	8/18/2001	MPU	L-11	193-013	Nabors 4ES	Jones	2				
	8/19/2001	TBU	M-14RD	201-171	Nabors 51	Grimaldi	2				1
	8/20/2001	KRU	2K-28	201-154	Nordic 3	Jones	4				
	8/22/2001	KRU	2N-348	201-142	Nabors 16E	Operator	2		1		
	8/25/2001	Kenai	21-6	165-006	Inlet GD1	Jones	7				
	8/28/2001	PBU	04-13	178-031	Doyon 16	Operator	2				
	8/31/2001	Kenai	14-32L	182-015	Dowell 9086	Grimaldi	2				
	8/31/2001	PBU	Y-02A	201-173	Nabors CDR1	Operator	1				
	9/1/2001	MPU	G-14L1	201-134	Nabors 27E	Operator	1				
	9/5/2001	MPU	L-35A	201-109	Nabors 27E	Operator	1				
	9/7/2001	TBU	K-24RD2	201-141	Nabors 58	Operator	2				
	9/7/2001	PBU	Y-02A	201-173	Nabors CDR1	Operator	1		1		

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2001 BOPE Tests											
	9/10/2001	MPU	L-35A	201-109	Nabors 27E	Jones	2				
	9/11/2001	MPU	I-11L1	201-138	Nabors 22E	Jones	4				
	9/13/2001	Alpine	CD2-39	201-160	Doyon 19	Operator	2				1
	9/14/2001	KRU	1C-102L1	201-172	Nabors 245	Operator	1		1		
	9/17/2001	PBU	N-20A	196-184	Doyon 16	Operator	1				
	9/18/2001	MPU	L-35A	201-109	Nabors 27E	Operator	1				
	9/22/2001	PBU	15-36A	201-162	Nabors 3S	Operator	1			1	
	9/23/2001	KRU	1C-102	201-161	Nabors 245	Spaulding	6				
	9/25/2001	KRU	2N-350	201-175	Nabors 16E	Operator	1	1			
	9/25/2001	MPU	L-35A	201-109	Nabors 27E	Operator	1				
	9/27/2001	MPU	I-11L1	201-138	Nabors 22E	Operator	2				
	10/1/2001	PBU	C-24	201-094	Nabors 4ES	Operator	1				
	10/2/2001	Grassim Oskolkoff	2	201-096	Inlet GD1	Jones	1		1		
	10/4/2001	TBU	M-12	201-176	Nabors 51	Operator	1	1			
	10/5/2001	KRU	1C-131	201-185	Nabors 245	Operator	1				
	10/6/2001	MPU	F-78	195-144	Nabors 4ES	Scheve	1				
	10/14/2001	TBU	M-12	201-176	Nabors 51	Spaulding	1				
	10/15/2001	KRU	1C-125	201-199	Nabors 245	Operator	1				
	10/17/2001	PBU	05-28	201-195	Nordic 1	Grimaldi	1				
	10/19/2001	KRU	2P-420	201-182	Doyon 141	Grimaldi	2				1
	10/19/2001	Grassim Oskolkoff	2	201-096	Inlet GD1	Operator	2		1		
	10/22/2001	MGS	A11-01	166-029	Inlet XTOA	Operator	2				
	10/23/2001	PBU	W-21A	201-111	Nabors 9ES	Jones	1				
	10/24/2001	KRU	2T-39	201-183	Nabors 16E	Jones	4	1	1		
	10/24/2001	PBU	Y-17B	201-179	Nabors 3S	Operator	1				
	10/27/2001	KRU	2P-420	201-182	Doyon 141	Operator	1				
	10/27/2001	PBU	A-02	171-031	Doyon 16	Operator	1		1		
	10/30/2001	KRU	1C-109	201-203	Nabors 245	Scheve	2				
	11/1/2001	MPU	I-12	201-163	Nabors 22E	Crisp	2	1			
	11/6/2001	Grassim Oskolkoff	2	201-096	Inlet GD1	Operator	2		1		
	11/6/2001	KRU	1C-109L1	201-204	Nabors 245	Operator	2				
	11/6/2001	TBU	A-09RD	181-036	Nabors 56	Jones	4		1		
	11/7/2001	PBU	K-05B	201-206	Nabors 2ES	Crisp	4				
	11/7/2001	PBU	M-13A	201-165	Nabors 3S	Operator	2		1	1	
	11/8/2001	PBU	K-05B	201-206	Nabors 2ES	Jones	7	1			
	11/12/2001	KRU	2P-415	201-131	Doyon 141	Operator	1				
	11/14/2001	PBU	E-103	201-200	Doyon 14	Operator	1				
	11/15/2001	PBU	M-13A	201-165	Nabors 3S	Operator	1			1	
	11/17/2001	Northstar	NS-13	201-088	Nabors 33E	Scheve	4		1		
	11/19/2001	PBU	U-15B	201-197	Nabors 3S	Operator	1				
	11/22/2001	Kenai	24-5RD	201-144	Inlet GD1	Jones	2		1		
	11/22/2001	Hansen	1	201-157	Nabors 273	Spaulding	2				
	11/23/2001	KRU	1R-35	201-210	Nabors 245	Operator	4	1			
	11/23/2001	TBU	A-15RD	201-189	Nabors 56	Operator	1	1			
	11/24/2001	PBU	Y-24	186-113	Doyon 16	Grimaldi	1				1
	11/24/2001	MGS	A11-01	166-029	Inlet XTOA	Jones	2				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2001 BOPE Tests											
	11/25/2001	PBU	14-40A	201-135	Nordic 1	Crisp	3		1		
	11/29/2001	KRU	2P-415	201-131	Doyon 141	Spaulding	2				
	12/1/2001	MPU	F-90	201-211	Nabors 27E	Operator	1				
	12/1/2001	MPU	I-11L1	201-137	Nabors 4ES	Jones	2				
	12/7/2001	KRU	1C-135	201-220	Nordic 3	Scheve	1				
	12/7/2001	PBU	05-12A	201-180	Nordic 1	Operator	1		1		
	12/9/2001	PBU	15-36A	201-162	Nabors 3S	Operator	1				
	12/12/2001	Susan Dionne	1RD	185-208	Inlet GD1	Operator	4	1	2		
	12/13/2001	TBU	A-15RD	201-189	Nabors 56	Operator	1				
	12/15/2001	KRU	1C-135	201-220	Nordic 3	Operator	1				
	12/16/2001	PBU	13-17	182-026	Doyon 16	Crisp	1				1
	12/17/2001	KRU	3N-19	201-225	Nabors 16E	Crisp	4				
	12/20/2001	Alpine	CD2-34	201-191	Doyon 19	Operator	1				
	12/21/2001	TBU	A-15RD	201-189	Nabors 56	Operator	1				
	12/21/2001	PBU	F-09A	201-198	Nordic 1	Operator	1		1		
	12/21/2001	KRU	1D-141	200-16	Nordic 3	Operator	1				
	12/22/2001	NNA	1	201-215	H & R Drilling 9	Grimaldi	6				
	12/27/2001	Alpine	CD2-34	201-191	Doyon 19	Operator	1				
	12/27/2001	Hansen	1	201-157	Nabors 273	Operator	1				
	12/28/2001	TBU	A-15RD	201-189	Nabors 56	Operator	1				
					Failure Totals - 2001		396	20	36	15	10

2001 Summary		
Tests	686	
Components Tested (~25/test)	17150	
Critical Components Failed	81	
Critical Component Failure Rate	0.004723	0.47%
All Componet Failure Rate	0.0230904	2.31%

BOP Performance: 2002 Failures

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2002 BOPE Tests											
	1/5/2002	PBU	K-05B	201-206	Nabors 3S	Operator	3		2		
	1/9/2002	NNA	1	201-215	H & R Drilling 9	Operator	1				
	1/12/2002	Northstar	NS-14	201-118	Nabors 33E	Jones	2			1	
	1/13/2002	PBU	13-20	182-009	Doyon 16	Jones	5				
	1/13/2002	Hansen	1	201-157	Nabors 273	Grimaldi	1				
	1/14/2002	Kenai	43-6RD	201-231	Inlet GD1	Operator	3				
	1/15/2002	Alpine	CD2-26	201-232	Doyon 19	Operator	1				
	1/16/2002	NNA	1	201-215	H & R Drilling 9	Operator	1		1		
	1/17/2002	PBU	05-26A	201-221	Nabors 2ES	Operator	1				
	1/23/2002	Cirque	3	201-244	Doyon 141	Scheve	1				
	1/23/2002	Alpine	CD2-49	201-249	Doyon 19	Operator	1				
	1/23/2002	Northstar	NS-14	201-118	Nabors 33E	Operator	1			1	
	1/25/2002	NNA	1	201-215	H & R Drilling 9	Jones	3				
	1/25/2002	MPU	S-15	201-245	Nabors 27E	Crisp	2		1		
	1/29/2002	Redoubt	4	201-194	Nabors 429	Operator	1				
	2/2/2002	NNA	1	201-215	H & R Drilling 9	Operator	1				
	2/8/2002	Alpine	CD2-17	202-015	Doyon 19	Operator	2				
	2/11/2002	Hansen	1	201-157	Nabors 273	Crisp	2				
	2/16/2002	Redoubt	4	201-194	Nabors 429	Operator	1				
	2/18/2002	Northstar	NS-08	201-021	Nabors 33E	Operator	3				
	2/19/2002	KRU	2P-422	201-246	Nabors 19E	Crisp	23		1		
	2/21/2002	PBU	S-17C	202-007	Nabors 3S	Jones	5				
	2/21/2002	TBU	K-1RD2	201-009	Nabors 58	Scheve	2				
	2/24/2002	PBU	15-29A	202-016	Nordic 1	Spaulding	1				
	2/24/2002	KRU	2P-451	202-008	Nordic 3	Operator	1				
	2/27/2002	TBU	K-12RD	178-057	Nabors 58	Operator	1				1
	2/28/2002	Hunter	A	202-013	Nabors 16E	Operator	2				
	3/1/2002	TBU	K-12RD	178-057	Nabors 58	Operator	1				1
	3/2/2002	PBU	Z-39	200-208	Doyon 14	Scheve	2				
	3/9/2002	KRU	2P-441	202-017	Nordic 3	Operator	1				
	3/10/2002	MPU	H-07A	202-028	Nabors 27E	Crisp	2				
	3/10/2002	TBU	K-30RD	170-007	Nabors 58	Operator	2				
	3/11/2002	KBU	23X-06	184-109	Inlet GD1	Operator	3				
	3/14/2002	PBU	Y-37A	202-046	Nabors 3S	Operator	2			1	
	3/15/2002	Griner	1	202-041	H & R Drilling 9	Grimaldi	2				
	3/15/2002	Hunter	A	202-013	Nabors 16e	Operator	2				
	3/16/2002	KRU	2P-441	202-011	Nordic 3	Spaulding	1				
	3/18/2002	Grizzly	1	202-040	Nabors 19E	Spaulding	6				
	3/18/2002	Northstar	NS-15	202-054	Nabors 33E	Jones	2		1		
	3/18/2002	PBU	L-102	202-036	Nabors 9ES	Jones	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2002 BOPE Tests											
	3/19/2002	Altamura	1	202-010	Nabors 14	Spaulding	3				
	3/21/2002	Nanuq	5	202-042	Doyon 19	Scheve	4				
	3/22/2002	KTU	32-7H	202-043	Inlet GD1	Operator	1				
	3/26/2002	TBU	K-17	173-001	Nabors 58	Operator	2				
	3/28/2002	Altamura	1	202-010	Nabors 14	Operator	1				
	3/28/2002	MPU	E-13B	202-044	Nabors 27E	Operator	1		1		
	3/28/2002	PBU	Y-37A	202-046	Nabors 3S	Operator	1				
	4/2/2002	PBU	W-10A	202-059	Nabors 3S	Operator	1			1	
	4/5/2002	Heavenly	1	202-060	Doyon 141	Jones	4				
	4/8/2002	PBU	L-119	202-064	Nabors 9ES	Operator	1				
	4/9/2002	KRU	3H-16A	200-022	Nordic 1	Jones	4		1		
	4/10/2002	KTU	32-7H	202-043	Inlet GD1	Operator	1				
	4/12/2002	TBU	G-7	168-061	Nabors 55	Grimaldi	3				
	4/17/2002	KTU	32-7H	202-043	Inlet GD1	Operator	1				
	4/17/2002	TBU	G-29	192-052	Nabors 55	Operator	1		1		
	4/18/2002	PBU	J-11A	196-104	Doyon 16	Grimaldi	1	1			
	4/22/2002	Northstar	NS-07	202-077	Nabors 33E	Operator	1				
	4/22/2002	Redoubt	5	202-083	Nabors 429	Jones	1		1		
	4/24/2002	TBU	G-29RD	192-052	Inlet GD1	Grimaldi	1				
	4/24/2002	MGS	C32-23LW	202-034	Inlet XTOC	Jones	1				
	4/27/2002	KRU	2P-427	202-018	Nordic 3	Operator	1				
	5/3/2002	KRU	3M-29A	202-084	Nordic 1	Operator	1				
	5/4/2002	KRU	2P-427	202-018	Nordic 3	Operator	2				
	5/5/2002	MGS	C34-23	167-051	Inlet XTOC	Crisp	2				1
	5/6/2002	Redoubt	4	201-194	Nabors 429	Operator	1	1			
	5/7/2002	Northstar	NS-07	202-077	Nabors 33E	Grimaldi	1				
	5/9/2002	PBU	C-09A	202-094	Nabors 3S	Operator	1			1	
	5/11/2002	PBU	W-08A	202-090	Doyon 14	Grimaldi	1				
	5/12/2002	KRU	1D-117	197-237	Nabors 245	Grimaldi	2			1	
	5/13/2002	Redoubt	4	201-194	Nabors 429	Operator	1				
	5/17/2002	PBU	X-35L1	202-078	Nabors 3S	Operator	1				
	5/17/2002	PBU	V-102	202-033	Nabors 9ES	Operator	1				
	5/18/2002	PBU	F-04A	202-100	Nordic 1	Crisp	3				
	5/20/2002	Redoubt	4	201-194	Nabors 429	Jones	1				
	5/23/2002	Northstar	NS-06	202-101	Nabors 33E	Operator	2				
	5/25/2002	MPU	F-66A	196-162	Nabors 4ES	Operator	1			1	
	5/29/2002	Redoubt	4	201-194	Dowell 9436	Jones	2				
	5/31/2002	Alpine	CD2-48	202-108	Doyon 19	Operator	1				
	5/31/2002	MPU	E-08	191-050	Nabors 4ES	Crisp	1				
	6/1/2002	Northstar	NS-06	202-101	Nabors 33E	Operator	2				1
	6/1/2002	TBU	G-12RD3	202-055	Nabors 54	Operator	1				
	6/3/2002	PBU	L-109	201-201	Nabors 9ES	Operator	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2002 BOPE Tests											
	6/8/2002	PBU	L-109	201-201	Nabors 9ES	Operator	1				
	6/9/2002	Susan Dionne	3	202-070	Inlet GD1	Grimaldi	1				
	6/10/2002	PBU	PSI-06	202-079	Nabors 27E	Jones	4				1
	6/14/2002	Redoubt	5	202-083	Nabors 429	Operator	1				
	6/15/2002	PBU	15-31A	202-102	Nordic 1	Operator	1				
	6/18/2002	PBU	PSI-06	202-079	Nabors 27E	Operator	1		1		
	6/21/2002	Northstar	NS-12	202-110	Nabors 33E	Crisp	1				1
	6/22/2002	PBU	S-113	202-120	Doyon 14	Grimaldi	4				
	6/22/2002	PBU	L-108	202-109	Nabors 9ES	Operator	1				
	6/23/2002	SRU	KGSF 2	202-119	Nabors 129	Scheve	4				
	6/24/2002	PBU	G-10B	202-117	Nordic 1	Operator	1	1			
	6/26/2002	PBU	D-08A	202-123	Nabors 2ES	Operator	1			1	
	7/2/2002	KRU	1C-104	202-061	Nabors 245	Jones	5				1
	7/4/2002	Alpine	CD2-23	202-134	Doyon 19	Operator	1				
	7/10/2002	SRU	KGSF 2	202-119	Nabors 129	Operator	1				
	7/11/2002	KRU	1C-104	202-061	Nabors 245	Operator	1				
	7/16/2002	PBU	PSI-01	202-145	Nabors 27E	Operator	1			1	
	7/18/2002	TBU	A-29RD	202-004	Nabors 56	Operator	1				
	7/19/2002	KRU	1C-104L1	202-062	Nabors 245	Operator	1				
	7/24/2002	Wolf Lake	1	184-201	Inlet GD1	Operator	5				
	7/25/2002	PBU	07-28AL1	202-106	Nordic 1	Scheve	1				
	7/25/2002	Alpine	CD2-41	202-126	Doyon 19	Operator	1				
	7/26/2002	PBU	S-112	202-135	Doyon 14	Scheve	1				
	7/29/2002	NCU	2	166-038	Aurora WS 1	Spaulding	7				1
	7/30/2002	KRU	1C-117	201-121	Nabors 245	Operator	1				
	8/8/2002	PBU	18-18B	202-121	Nordic 1	Operator	1				
	8/10/2002	Redoubt	5	202-083	Nabors 429	Operator	1				
	8/12/2002	MPU	S-31	202-014	Doyon 141	Jones	1				
	8/13/2002	Wolf Lake	1	202-088	Inlet GD1	Scheve	2				
	8/20/2002	Wolf Lake	1	202-088	Inlet GD1	Operator	1				
	8/27/2002	Alpine	CD2-38	202-171	Doyon 19	Operator	3				
	8/28/2002	NCU	2	166-038	Aurora WS 1	Scheve	5				
	8/29/2002	Northstar	NS-17	202-169	Nabors 33E	Operator	1				
	8/29/2002	PBU	E-09B	202-161	Nordic 1	Grimaldi	3				
	9/3/2002	Alpine	CD2-38	202-171	Doyon 19	Jones	2				
	9/3/2002	Northstar	NS-17	202-169	Nabors 33E	Operator	1				
	9/5/2002	Wolf Lake	2	198-142	Inlet GD1	Operator	2				
	9/13/2002	Northstar	NS-17	202-169	Nabors 33E	Operator	1				1
	9/15/2002	SCU	43B-08	190-152	Nabors 26S	Operator	1	1			
	9/15/2002	PBU	A-22	182-018	Nabors 2ES	Crisp	1				
	9/16/2002	PBU	A-22	182-018	Nabors 2ES	Crisp	1				
	9/17/2002	PBU	S-114	202-175	Doyon 14	Operator	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2002 BOPE Tests											
	9/18/2002	NCU	1A	202-162	Aurora Gas LLC 1	Operator	1		1		
	9/18/2002	Alpine	CD2-44	202-165	Doyon 19	Operator	1				
	9/19/2002	SRU	21B-16	185-255	Nabors 26S	Operator	1				
	9/20/2002	KBU	41-7X	202-025	Inlet GD1	Grimaldi	2				
	9/25/2002	NCIU	B-2	197-210	BJ	Grimaldi	1				
	9/26/2002	Alpine	CD2-29	202-148	Doyon 19	Operator	1				
	9/28/2002	KBU	41-7X	202-025	Inlet GD1	Operator	1				
	10/1/2002	PBU	W-38A	202-191	Doyon 14	Scheve	1		1		
	10/2/2002	Alpine	CD2-29	202-148	Doyon 19	Operator	1				
	10/7/2002	PBU	J-20B	202-170	Nordic 2	Crisp	2		1		
	10/8/2002	PBU	W-38A	202-191	Doyon 14	Operator	1				
	10/10/2002	Alpine	CD2-13	202-203	Doyon 19	Operator	1				
	10/11/2002	Kenai	14-6	174-050	Inlet GD1	Operator	2				
	10/11/2002	MPU	I-02	190-091	Nabors 4ES	Jones	4				
	10/14/2002	PBU	W-38A	202-191	Doyon 14	Operator	1				
	10/16/2002	Alpine	CD2-13	202-203	Doyon 19	Operator	1				
	10/18/2002	MGS	C13-13LN	202-213	Inlet XTOC	Grimaldi	2				
	10/24/2002	Alpine	CD2-13	202-203	Doyon 19	Operator	1				
	10/26/2002	PBU	V-109	202-202	Nabors 9ES	Grimaldi	1				
	10/28/2002	TBU	K-12RD	178-057	Cudd 131	Jones	3			1	1
	10/31/2002	PBU	V-109	202-202	Nabors 9ES	Jones	2				
	11/1/2002	PBU	W-32A	202-209	Doyon 14	Operator	1				
	11/1/2002	Northstar	NS-19	202-207	Nabors 33E	Jones	1				
	11/7/2002	PBU	V-109	202-202	Nabors 9ES	Operator	1				
	11/8/2002	Northstar	NS-19	202-207	Nabors 33E	Operator	1				
	11/9/2002	TBU	M-29	191-027	Nabors 51	Crisp	1				
	11/9/2002	PBU	J-27A	202-200	Nordic 1	Operator	1			1	
	11/11/2002	MPU	I-02	190-091	Nabors 4ES	Jones	4				
	11/12/2002	Redoubt	2	201-031	Nabors 429	Operator	1	1			
	11/15/2002	KRU	3S-07	202-187	Nabors 7ES	Crisp	2				
	11/16/2002	PBU	W-32A	202-209	Doyon 14	Crisp	1				
	11/16/2002	TBU	M-28	190-019	Nabors 51	Operator	1				
	11/16/2002	PBU	J-01B	202-201	Nordic 1	Operator	1			1	
	11/22/2002	PBU	W-15A	202-151	Nordic 2	Jones	5				
	11/25/2002	PBU	14-08AL1	202-210	Nordic 1	Operator	1			1	
	11/26/2002	Northstar	NS-22	202-223	Nabors 33E	Operator	1				
	11/27/2002	MGS	C13-13LN	202-213	Inlet XTOC	Operator	2				
	11/28/2002	Granite Pt	50	192-041	Cudd 131	Grimaldi	4	1	2		
	11/28/2002	PBU	W-37A	202-149	Nordic 2	Operator	3				
	12/3/2002	MGS	C13-13LN	202-213	Inlet XTOC	Operator	2				
	12/3/2002	PBU	K-20	202-224	Nordic 1	Operator	1			1	
	12/4/2002	Redoubt	3	201-064	Nabors 429	Jones	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2002 BOPE Tests											
	12/6/2002	PBU	W-32A	202-209	Nordic 2	Operator	3				
	12/8/2002	KRU	3S-09	202-205	Nabors 7ES	Operator	1				
	12/9/2002	PBU	18-05A	202-219	Nabors 2ES	Operator	1	1			
	12/10/2002	PBU	W-32A	202-209	Nordic 2	Operator	3				
	12/15/2002	TBU	G-15RD	198-099	Nabors 54	Grimaldi	1				
	12/17/2002	PBU	M-09B	202-220	Nordic 2	Operator	1				
	12/18/2002	KRU	1C-22	202-222	Doyon 141	Scheve	3		1	1	
	12/18/2002	Sterling	41-15	198-041	BJ 170	Grimaldi	1				
	12/18/2002	KRU	1C-22	202-222	Doyon 141	Scheve	3				
	12/25/2002	PBU	L-02	201-207	Doyon 14	Operator	1				
	12/27/2002	Redoubt	6	202-228	Nabors 429	Operator	1				
					Failure Totals - 2002		324	7	17	15	10

2002 Summary		
Tests	598	
Components Tested (~25/test)	14950	
Critical Components Failed	49	
Critical Component Failure Rate	0.0032776	0.33%
All Componet Failure Rate	0.0216722	2.17%

BOP Performance: 2003 Failures

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2003 BOPE Tests											
	1/3/2003	PBU	L-112	202-229	Doyon 14	Jones	3		1		1
	1/6/2003	PBU	K-317B	201-156	Nordic 2	Operator	1				
	1/7/2003	MPU	J-06	194-095	Nabors 4ES	Jones	1				
	1/8/2003	Alpine	CD2-35A	202-244	Doyon 19	Jones	4				
	1/15/2003	MPU	E-09B	194-132	Nabors 4ES	Operator	1				
	1/15/2003	PBU	K-317B	201-156	Nordic 2	Operator	1				
	1/17/2003	Northstar	NS-22	202-223	Nabors 33E	Crisp	2		1		
	1/25/2003	MPU	S-19A	202-233	Doyon 14	Operator	2				
	1/26/2003	DIU	4-10A	202-238	Doyon 15	Spaulding	4				
	1/26/2003	PBU	15-30A	202-089	Nordic 2	Operator	1			1	
	1/29/2003	Northstar	NS-06	202-101	Nabors 33E	Operator	2		1		
	1/31/2003	Alpine	CD2-08	202-250	Doyon 19	Operator	1				
	1/31/2003	PBU	F-06	171-012	Nabors 4ES	Scheve	1				
	2/2/2003	TBU	D-17RD	181-023	Nabors 77	Crisp	2				
	2/3/2003	KRU	3S-16	203-007	Nabors 7ES	Operator	1				
	2/6/2003	PBU	15-38A	203-016	Nordic 1	Operator	1		1		
	2/8/2003	Abalone	1	202-129	Inlet 1	Crisp	2				
	2/8/2003	PBU	07-29B	202-239	Nordic 2	Jones	2				
	2/9/2003	Northstar	NS-06	202-101	Nabors 33E	Operator	1				
	2/9/2003	TBU	D-17RD	181-023	Nabors 77	Operator	1				
	2/12/2003	PBU	15-48A	203-005	Nordic 1	Operator	1				
	2/13/2003	Alpine	CD2-36	203-014	Doyon 19	Operator	1				
	2/15/2003	Abalone	1	202-129	Inlet GD1	Operator	3		1		
	2/21/2003	TBU	D-47	191-011	Nabors 77	Operator	1				
	2/24/2003	DIU	3-17E	202-247	Doyon 15	Scheve	1				
	3/2/2003	KRU	3S-08	203-022	Nabors 7ES	Crisp	2				
	3/3/2003	PBU	L-121	203-013	Nabors 9ES	Crisp	1				
	3/3/2003	PBU	W-19AL1	202-235	Nordic 1	Operator	1			1	
	3/4/2003	Abalone	1	202-129	Inlet GD1	Operator	1				
	3/7/2003	MPU	S-12	203-023	Doyon 14	Operator	1				
	3/13/2003	BCU	6	181-150	Inlet GD1	Operator	1				
	3/13/2003	KRU	2B-03A	203-009	Nordic 2	Operator	1				
	3/17/2003	Puviaq	1	202-248	Nabors 16E	Operator	1				
	3/17/2003	PBU	PM2-54A	203-010	Nordic 1	Operator	1		1		
	3/19/2003	DIU	2-28A	203-006	Doyon 15	Grimaldi	4		2		
	3/19/2003	Hansen	1A	203-004	Nabors 273	Jones	1				
	3/21/2003	BCU	6	181-150	Inlet GD1	Spaulding	1				
	3/22/2003	Natchiq	1	202-227	Nordic 3	Crisp	4		1		1
	3/26/2003	Kustatan	1	20-153	Inlet CC1	Jones	4				1
	3/28/2003	PBU	E-01A	203-033	Nordic 1	Jones	2				1
	3/30/2003	KRU	2T-218	203-017	Doyon 19	Jones	4		1		
	3/31/2003	KRU	3S-21	203-031	Nabors 7ES	Operator	1				
	4/1/2003	KRU	3S-21	203-031	Nabors 7ES	Operator	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2003 BOPE Tests											
	4/5/2003	WMRU	D1	192-156	Inlet CC1	Operator	3				
	4/11/2003	KRU	1C-178	203-041	Doyon 141	Crisp	2				
	4/11/2003	KRU	3S-23	203-045	Nabors 7ES	Grimaldi	1				
	4/13/2003	BCU	11	203-025	Inlet GD1	Operator	1				
	4/16/2003	DIU	3-25B	203-021	Doyon 15	Operator	1				
	4/20/2003	PBU	W-23A	203-056	Nabors 9ES	Operator	1				
	4/21/2003	PBU	13-13A	203-036	Nabors 2ES	Jones	2				1
	4/22/2003	Alpine	CD2-51	202-249	Doyon 19	Operator	1				
	4/22/2003	Redoubt	3	201-064	Nabors 429	Crisp	2				
	4/28/2003	Northstar	NS-23	203-050	Nabors 33E	Operator	2		2		
	4/29/2003	KRU	3S-17	203-015	Nabors 7ES	Operator	1				
	4/30/2003	MPU	S-04	203-052	Doyon 14	Operator	1				
	5/7/2003	PBU	V-202	203-077	Nabors 9ES	Spaulding	1				1
	5/13/2003	Northstar	NS-20	202-188	Nabors 33E	Jones	2				
	5/13/2003	PBU	18-14B	203-063	Nordic 1	Jones	2				1
	5/14/2003	MPU	K-37	196-076	Nabors 4ES	Crisp	1				
	5/17/2003	PBU	02-05A	203-082	Nordic 1	Operator	1				
	5/21/2003	SRU	KGSF 3	203-074	Nabors 129	Jones	8		1		1
	5/25/2003	BCU	3RD	203-044	Inlet GD1	Operator	2		2		
	5/29/2003	MPU	L-01A	203-064	Nordic 2	Spaulding	3				1
	5/31/2003	PBU	C-16A	203-084	Nabors 2ES	Spaulding	2				
	6/2/2003	KBU	43-7X	203-066	Inlet GD1	Operator	1				
	6/7/2003	MPU	S-10	203-067	Doyon 14	Operator	1	1			
	6/8/2003	Redoubt	4A	203-081	Nabors 429	Operator	1				
	6/16/2003	MPU	C-26L1	203-076	Nordic 2	Operator	1				
	6/17/2003	KRU	1C-172	203-096	Doyon 141	Spaulding	3				1
	6/18/2003	Happy Valley	1	203-072	Nabors 129	Grimaldi	4	1			
	6/19/2003	KBU	14X-6	181-092	Inlet GD1	Operator	1				
	6/19/2003	Redoubt	4A	203-081	Nabors 429	Jones	2	1			
	6/22/2003	NCIU	A-10	169-088	Kuukpik 5	Crisp	5				
	6/24/2003	MPU	C-26L1	203-076	Nordic 2	Operator	1			1	
	6/26/2003	PBU	14-32	183-133	Nabors 4ES	Grimaldi	1				1
	6/28/2003	PBU	V-117	203-090	Nabors 9ES	Grimaldi	1				
	6/29/2003	NCIU	A-10	169-088	Kuukpik 5	Operator	2				
	6/30/2003	Alpine	CD2-20	202-249	Doyon 19	Scheve	1				
	6/30/2003	PBU	15-07C	203-097	Nabors 2ES	Operator	1				
	7/2/2003	Happy Valley	1	203-072	Nabors 129	Operator	1				
	7/9/2003	PBU	W-16L1	203-100	Nordic 1	Jones	5		1		
	7/13/2003	Redoubt	4A	203-081	Nabors 429	Operator	1				
	7/15/2003	NCIU	A-10A	169-088	Kuukpik 5	Operator	1			1	
	7/16/2003	Happy Valley	2	203-113	Nabors 129	Operator	1				
	7/18/2003	MPU	S-06	203-109	Doyon 14	Scheve	2				
	7/27/2003	KRU	1A-08	178-040	Nabors 3S	Grimaldi	3				1
	7/31/2003	Alpine	CD2-40	203-126	Doyon 19	Operator	1				
	8/6/2003	Kustatan	1	200-153	Inlet CC1	Grimaldi	2				1

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2003 BOPE Tests											
	8/10/2003	NCU	3	167-007	Aurora WS 1	Jones	9				3
	8/14/2003	NCU	3	167-007	Aurora WS 1	Jones	4				
	8/15/2003	Sterling	41-15	198-041	Inlet GD1	Operator	2				
	8/15/2003	Alpine	CD2-40	203-126	Doyon 19	Grimaldi	1				
	8/16/2003	KRU	3J-19	196-148	Nabors 3S	Operator	2				
	8/18/2003	Sterling	41-15	198-041	Inlet GD1	Operator	1				
	8/18/2003	NCIU	A-10A	203-075	Kuukpik 5	Operator	1				
	8/20/2003	Alpine	CD2-40	203-126	Doyon 19	Operator	1			1	
	8/20/2003	PBU	15-28A	203-124	Nordic 1	Operator	1			1	
	8/24/2003	KRU	1B-101L1	203-134	Doyon 141	Jones	2		1		
	8/25/2003	SRU	12-15	160-022	Schlumberger 2	Operator	2		1	1	
	8/26/2003	KRU	2U-08	185-021	Nabors 3S	Operator	1				
	8/26/2003	PBU	Z-26	189-052	Nabors 4ES	Jones	2				1
	8/26/2003	PBU	W-205	203-116	Nabors 9ES	Jones	2				
	8/27/2003	NCIU	A-10A	203-075	Kuukpik 5	Operator	1				
	8/28/2003	PBU	F-15A	203-137	Nordic 1	Scheve	2				
	8/30/2003	PBU	L1-15A	203-120	Nordic 2	Scheve	4			1	
	9/4/2003	PBU	F-15A	203-137	Nordic 1	Operator	4			1	
	9/6/2003	KRU	2U-10	185-039	Nabors 3S	Crisp	3				
	9/6/2003	PBU	L1-15A	203-120	Nordic 2	Operator	1		1		
	9/10/2003	PBU	F-06A	203-149	Nabors 2ES	Grimaldi	2				
	9/11/2003	MPU	S-35	203-143	Doyon 14	Jones	1				
	9/15/2003	NCU	9	202-208	Aurora WS 1	Operator	2				
	9/21/2003	PBU	G-12B	203-141	Nordic 1	Operator	1			1	
	9/24/2003	Alpine	CD2-55	203-118	Doyon 19	Operator	1				
	9/28/2003	Redoubt	7	203-150	Nabors 429	Jones	1				
	9/29/2003	PBU	G-12B	203-141	Nordic 1	Operator	2			1	
	10/4/2003	PBU	Q-07B	203-157	Nabors 2ES	Operator	1			1	
	10/5/2003	NCIU	B-3	198-058	Kuukpik 5	Operator	1				
	10/6/2003	Moquawkie	1	203-069	Aurora WS 1	Operator					
	10/7/2003	Northstar	NS-29	201-041	Nabors 33E	Jones	3				
	10/12/2003	CLU	1RD	203-129	Inlet GD1	Operator	2		1		
	10/17/2003	PBU	07-14B	203-142	Nordic 1	Crisp	1				
	10/23/2003	PBU	S-102L1	203-156	Nordic 1	Operator	1			1	
	10/24/2003	Kasilof South	1	202-256	Nabors 273	Operator	1				
	10/25/2003	PBU	W-400	203-165	Doyon 141	Operator	1				
	10/26/2003	PBU	07-33B	203-112	Nordic 2	Jones	3		1		
	10/27/2003	Northstar	NS-29	201-041	Nabors 33E	Operator	1				
	10/28/2003	KRU	1D-110A	200-039	Nabors 3S	Jones	4				
	11/2/2003	Kasilof South	1	202-256	Nabors 273	Grimaldi	1				
	11/3/2003	PBU	A-24	182-070	Nabors 4ES	Operator	1				
	11/12/2003	TBU	M-16RD	203-182	Nabors 51	Operator	1				1
	11/13/2003	PBU	13-30A	203-180	Nabors 2ES	Jones	3		1		
	11/14/2003	BCU	13	203-138	Inlet GD1	Operator	1				
	11/14/2003	PBU	H-04	203-161	Nordic 1	Operator	1			1	

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2003 BOPE Tests											
	11/21/2003	PBU	H-04	203-161	Nordic 1	Operator	1			1	
	11/21/2003	Northstar	NS-25	203-166	Nabors 33E	Crisp	2				
	11/22/2003	Iliamna	1	203-172	Pelican Hill 7	Operator	2		1		
	11/22/2003	Alpine	CD2-07	203-187	Doyon 19	Operator	2		1		
	11/25/2003	Northstar	NS-27	201-027	Nabors 33E	Operator	1			1	
	11/27/2003	PBU	S-27B	203-168	Nabors 2ES	Operator	1		1		
	11/28/2003	PBU	Z-100	203-171	Nabors 7ES	Crisp	3				2
	12/10/2003	PBU	K-19AL1	203-190	Nordic 1	Operator	1			1	
	12/17/2003	PBU	W-01A	203-176	Nordic 2	Crisp	1				
	12/18/2003	KBU	33-6X	203-183	Nabors 129	Operator	1				
	12/20/2003	PBU	02-37L1	203-098	Nordic 1	Operator	1			1	
	12/29/2003	KBU	33-6X	203-183	Nabors 129	Operator	1				
	12/31/2003	PBU	15-33B	203-194	Nordic 1	Jones	3		1		
	12/31/2003	KRU	2P-424	203-203	Doyon 141	Operator	1				
					Failure Totals - 2003		260	3	26	18	20

2003 Summary		
Tests	592	
Components Tested (~25/test)	14800	
Critical Components Failed	67	
Critical Component Failure Rate	0.004527	0.45%
All Componet Failure Rate	0.0175676	1.76%

BOP Performance: 2004 Failures

valid thru: 4/30/2004

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2004 BOPE Tests											
	1/4/2004	PBU	L-210	203-199	Nabors 9ES	Grimaldi	2				
	1/5/2004	PBU	15-04A	203-114	Nordic 2	Operator	1				
	1/6/2004	CLU	7	203-191	Inlet GD1	Operator	1				
	1/6/2004	Kasilof South	1	202-256	Nabors 273	Operator	1				
	1/8/2004	PBU	L2-14	187-102	Nabors 2ES	Jones	1				
	1/12/2004	PBU	05-41A	203-170	Nordic 1	Operator	1				
	1/13/2004	Kasilof South	1	202-256	Nabors 273	Grimaldi	1				
	1/13/2004	PBU	Z-30A	203-219	Nabors 7ES	Spaulding	1				
	1/13/2004	PBU	15-04A	203-114	Nordic 2	Operator	1				
	1/19/2004	PBU	L2-14A	203-214	Nordic 2	Operator	1				
	1/21/2004	PBU	05-41A	203-170	Nordic 1	Operator	1				
	1/24/2004	Redoubt	1	200-165	Cudd 131	Jones	13			1	2
	1/26/2004	Alpine	CD1-23	203-225	Doyon 19	Scheve	5		2		
	1/26/2004	PBU	01-17B	204-012	Nordic 1	Operator	1			1	
	1/28/2004	Hot Ice	1	203-026	DynaTec 6	Crisp	5				
	1/28/2004	CLU	8	204-005	Inlet GD1	Jones	2				
	1/30/2004	MPU	G-16L1	203-211	Doyon 14	Operator	1				
	2/2/2004	Redoubt	1	200-165	Cudd 131	Operator	7				2
	2/3/2004	KRU	3F-19A	204-016	Nordic 3	Crisp	1				
	2/11/2004	Redoubt	1	200-165	Cudd 131	Operator	1				
	2/11/2004	Niakuk	NK-12C	203-055	Nordic 1	Operator	1				
	2/12/2004	PBU	17-07A	204-011	Nabors 7ES	Jones	4				
	2/13/2004	PBU	A-28	182-150	Nabors 4ES	Jones	3				
	2/13/2004	Happy Valley	5	204-007	Kuukpik 5	Grimaldi	3	1	1		
	2/14/2004	KRU	2P-449	204-026	Doyon 141	Operator	2				
	2/15/2004	KRU	3F-19A	204-016	Nordic 3	Scheve	3		1		
	2/18/2004	Niakuk	NK-12C	203-055	Nordic 1	Operator	1				
	2/21/2004	Redoubt	1	200-165	Cudd 131	Grimaldi	4				
	2/21/2004	PBU	01-19A	202-022	Nabors 4ES	Operator	1		1		
	2/25/2004	Nikaitchuq	1	204-018	Nabors 27E	Spaulding	2				
	2/26/2004	Happy Valley	3	203-022	Kuukpik 5	Grimaldi	2		2		
	2/27/2004	Paxton	1	204-010	Nabors 129	Operator	1				
	2/27/2004	PBU	A-38L2	203-184	Nordic 1	Operator	4				1
	2/28/2004	DIU	03-17F	203-216	Nordic 2	Operator	1				
	2/29/2004	Redoubt	1	200-165	Cudd 131	Operator	1				
	3/10/2004	Redoubt	7	203-150	Cudd 131	Operator	8				
	3/11/2004	DIU	03-17F	203-216	Nordic 2	Operator	1				
	3/11/2004	Placer	1	204-014	Nordic 3	Grimaldi	2				
	3/13/2004	Happy Valley	3	203-022	Kuukpik 5	Operator	2				
	3/18/2004	Redoubt	7	203-150	Cudd 131	Scheve	1				

File Name	Date	Field/Unit	Well	PTD	Rig	Witnessed?	# Components Failed	Critical Component Failures			
								ANN	PR	BR	ACCUM
2004 BOPE Tests											
	3/18/2004	Nikaitchuq	2	204-038	Nabors 27E	Crisp	2				
	3/21/2004	PBU	03-07A	204-043	Nabors 2ES	Jones	2	1			
	3/22/2004	KBU	33-6	199-024	Inlet GD1	Operator	1				
	3/24/2004	Nikaitchuq	2	204-038	Nabors 27E	Operator	1				
	3/26/2004	MPU	C-43	204-039	Doyon 14	Scheve	2				
	3/29/2004	Spark	4	204-008	Doyon 19	Operator	3				
	4/1/2004	PBU	L-201	204-046	Nabors 9ES	Crisp	2				
	4/4/2004	KRU	1E-119	204-031	Doyon 141	Operator	1				
	4/5/2004	DIU	1-65A	203-212	Nordic 2	Scheve	2				
	4/9/2004	MGS	C43-14	188-132	XTOC	Operator	1				
	4/9/2004	KRU	2P-443	204-032	Nordic 3	Jones	3			1	
	4/10/2004	Happy Valley	6	204-044	Kuukpik 5	Operator	2				
	4/13/2004	PBU	L-201L1	204-047	Nabors 9ES	Operator	1				
	4/18/2004	Alpine	CD1-46	204-024	Doyon 19	Operator	2	1			
	4/18/2004	Kenai	31-7X	200-148	Inlet GD1	Grimaldi	1				
	4/21/2004	PBU	L-201L2	204-048	Nabors 9ES	Operator	1				
	4/21/2004	PBU	14-06A	204-036	Nordic 2	Grimaldi	2	1			1
	4/23/2004	KRU	1L-09	190-034	Nabors 3S	Grimaldi	2				
	4/29/2004	PBU	14-06A	204-036	Nordic 2	Operator	1	1			
					Failure Totals - 2004		127	5	7	3	6

valid thru: 4/30/2004

2004 Summary		
Tests	177	
Components Tested (~25/test)	4425	
Critical Components Failed	21	
Critical Component Failure Rate	0.0047458	0.47%
All Componet Failure Rate	0.000452	0.05%

BOPE Failure Rates: 2001-2004

	2001	2002	2003	2004*	Totals
BOPE Tests	686	598	592	177	2053
Components Tested (25/test)	17150	14950	14800	4425	51325
All Components Failed	396	324	260	127	1107
All Components Failure Rate	2.31%	2.17%	1.76%	2.87%	2.16%
Critical Components Failed	81	49	67	21	218
Annular	20	7	3	5	35
Pipe Rams	36	17	26	7	86
Blind Rams	15	15	18	3	51
Accumulator	10	10	20	6	46
Critical Component Failure Rate	**0.47%**	**0.33%**	**0.45%**	**0.47%**	**0.42%**

* 2004 Failure Rates Valid Through: **4/30/2004**

also Kuparuk 34-11-10/1 188-158
nasty kick w/ underground "blowout"

BP-AMOCO EXPLORATION, ALASKA

Historical Blowout Study

North Slope, Alaska

Prepared by

FAIRWEATHER
E&P SERVICES, INC.

Anchorage, Alaska

June, 2000

Historical Blowout Study
North Slope, Alaska

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Alaska North Slope Historical Blowout Study

Purpose and Scope of Study

BP-Amoco Exploration (Alaska), Inc. contracted Fairweather E&P Services, Inc. to perform an exhaustive review and documentation of all historical loss-of-control well incidents that have occurred to date on the North Slope of Alaska.

The scope of the study includes documentation of known well control incidents, a search of all available sources of information that may reveal poorly documented or forgotten North Slope well control incidents and documentation of them. Although the primary subject of this study is blowouts, other serious well control incidents that did not ultimately result in blowouts are discussed. It is important to be aware of these non-blowout incidents, as they are the root subjects of much anecdotal evidence prevalent among people within and outside of the industry in Alaska.

This study does not attempt to document in detail everything that happened during each blowout or well control incident. If such detailed knowledge is needed on any particular event, the information source list contained in this report will steer the researcher to sources of detailed information.

Research Methods and Sources

This study uses as it's starting point the results of C.R. Mallary's 1998 study, "A Review of Alaska North Slope Blowouts, 1974–1997" for BP Exploration (Alaska), Inc. Mallary's study covers recent, well-documented blowouts, but was limited in scope to relatively recent times and to wells that suffered catastrophic blowouts. In the preparation of the current report, there was no additional research performed on 5 of the 7 wells cited in Mallary's study and the narratives included here are substantially unchanged from his. Mallary touched on the CPF1-23 and Challenge Island #1 blowouts, but did not detail them, as research on those incidents was ongoing when his report was issued. These 2 wells were researched for this report and are expanded upon here.

Tracking down information on undocumented well control problems for this study began with conducting interviews with various people within or associated with the drilling industry on the North Slope. Many are no longer active in the industry, but served as excellent sources of information. These interviews yielded clues to additional sources as well as names and approximate dates of candidate wells that were then further researched in the archives of Operators and State and Federal agencies.

We are confident that all of the North Slope blowouts that have occurred are documented here. The Alaska Oil and gas Conservation Commission maintains an internal documentation of blowouts in Alaska and, while neither we nor Mallary were permitted to examine that documentation, the AOGCC has assured us that we have overlooked no North Slope blowouts of which they are aware. Further, all published reports on wells drilled by and for Federal agencies on the North Slope were reviewed and interviews were conducted with Federal agency personnel and private contractors involved with the wells. All of the troublesome wells referenced in the reports or referred to in interviews were researched and the ones found to be real and significant are included in this study. Finally, many people who are known to have been involved in and knowledgeable about the Alaskan oil industry were interviewed on the subject of memorable troublesome wells and all of the wells they referenced were investigated.

Our research was halted when all new information sources consistently referenced the same wells already investigated and no new incidents were being brought to light. Sufficient overlaps and repeats of information exist as well as lack of further evidence in the various archives examined and interviews conducted that we are confident there are no blowouts or serious well control incidents left un-addressed in this study. A comprehensive list of sources is listed at the end of this study and all incident narratives reference the appropriate listed sources.

Documentation of well control incidents in the historical record prior to 1970, when the industry became firmly established on the North Slope, is very sketchy. The only formal documentation is contained in general reports by and for government agencies summarizing large, multi-well exploration programs that emphasized geological findings rather than operational details. Researchers will find little more in those reports than what is offered in the narratives in this report. These early events also suffer the disadvantage of having occurred so long ago that there are few people left to provide even anecdotal evidence. Nevertheless, the search performed through published reports on wells drilled prior to 1970 leaves us confident that there were no wells left un-examined and no serious incidents left unidentified here.

Recent well control incidents present the opposite problem. They are documented in so much detail and by so many parties that discerning what actually occurred and what the causes were sometimes becomes a challenge. The narratives presented here summarize the events but do not attempt to detail causes as post-event analyses by operators, individuals and agencies often conflict as to the causes. Detailed documentation of these events can be found by consulting the sources cited at the end of this report.

Definition of Blowout
It became necessary early in the research phase to provide interviewees and agencies with a strict definition of "blowout" in order to focus the search. The definition we provided and which we use in referring to blowouts in this study is:

Blowout: An uncontrolled flow at the surface of liquids and/or gas from the wellbore resulting from human error and/or equipment failure.

This definition resulted in downgrading the subjects of much dramatic anecdotal evidence from "blowout" to "well control incident". Several "blowouts" recalled in interviews turned out to be kicks that necessitated lengthy and difficult operations to bring the well back under control but did not meet the definition of blowout as given above.

Incidents Documented
The table on Page 4 lists the blowouts and well control incidents identified and discussed in this report. The list of blowouts is complete. However, the well control incidents, or "kicks", listed are only those that entailed a greater amount of time and/or effort than usual to retain control of the well. It is not within the scope of this study to identify every historical kick that was routinely encountered and circulated out.

As will be seen in the narratives for Simpson Core Tests #16 and #26, it could be questionable that they be called blowouts. They technically meet the definition of blowout given above, but the flows to surface were un-spectacular and could not have been avoided in that there were no casings or BOPE available to prevent them.

Geographic Characterization
The types and timing of North Slope well control incidents divide themselves into three geographical areas. The Eastern North Slope around the Pt. Thomson/ Flaxman Island area has a history of pressure problems at depths around 12,000'. Several large kicks have been encountered, of which Exxon's Alaska State A-1 (documented in this report) is typical, but there have been no blowouts.

The blowouts on the Western North Slope all occurred during early U.S. Navy exploration of Naval Petroleum Reserve No. 4 (now called NPRA) and resulted from poor drilling practices used long ago.

The Central North Slope contains all of the developed and developing North Slope oilfields.

BLOWOUTS

Well		Year	Field/Area	Operation at Time	Influx Fluid	Operator
Simpson Core Test #16		1949	NPRA, Cape Simpson	Drilling (exploratory)	Gas	U.S. Navy
Simpson Core Test #26		1950	NPRA, Cape Simpson	Drilling (exploratory)	Oil	U.S. Navy
Gubik #2		1951	Near Umiat, Western N. Slope	Drilling (exploratory)	Gas	U.S. Navy
Kavik #1		1969	Canning R., Eastern N. Slope	Drilling (exploratory)	Gas	Pan American Petroleum Corp.
NGI-7	*	1976	Prudhoe Bay Field	Workover (development)	Gas	ARCO Alaska, Inc.
CPF1-23	*	1979	Kuparuk River Field	Drilling (disposal well)	Gas	ARCO Alaska, Inc.
F-20	*	1986	Prudhoe Bay Field	Drilling (development)	Gas	BP Exploration (Alaska), Inc.
J-23	*	1987	Prudhoe Bay Field	Completion (development)	Gas	BP Exploration (Alaska), Inc.
Cirque #1	*	1992	Colville R., Central N. Slope	Drilling (exploratory)	Gas	ARCO Alaska, Inc.
1-53/Q-20	*	1994	Endicott Field	Drilling (development)	Gas	BP Exploration (Alaska), Inc.

KICKS

Well		Year	Field/Area	Type of Well	Influx Fluid	Operator
Alaska State A-1		1975	Flaxman Is., Eastern N. Slope	Drilling (exploratory)	Gas	Exxon
Tunalik Test Well #1		1978	NPRA, Icy Cape	Drilling (exploratory)	Gas	U.S. Geological Survey
15-21		1980	Prudhoe Bay Field	Drilling (development)	Gas	ARCO Alaska, Inc.
Challenge Island #1	*	1981	Pt. Thomson, Eastern N. Slope	Drilling (exploratory)	Gas w/ minor oil	Sohio Alaska Petroleum Co.
L5-36		1989	Lisburne Field	Drilling (development)	Gas	ARCO Alaska, Inc.
1H-15		1993	Kuparuk River Field	Drilling (development)	Unknown	ARCO Alaska, Inc.
3F-19		1996	Kuparuk River Field	Drilling (development)	Unknown	ARCO Alaska, Inc.

* Incident previously identified in Mallary study (1998)

BLOWOUT NARRATIVES

Simpson Core Test #16
Simpson Core Test #26
Gubik #2
Kavik #1
NGI-7
CPF1-23
F-20
J-23
Cirque #1
1-53/Q-20

SIMPSON CORE TEST # 16
U.S. NAVY

The history of Simpson Core Test #16, spudded on August 24, 1949, is extremely sketchy. This well, located near Simpson Lagoon on the Western North Slope, experienced a gas blowout, and produced gas for more than a year afterward.

No casing was set in the well. On August 31, 1949, while drilling at a depth of 800' gas came to surface and accidentally caught fire. 600 gallons of water were pumped into the well in an attempt to kill it, but the gas blew out most of it back out. The rig was then moved off of the well. Melting of surficial ice and sloughing around the hole created a funnel-shaped cavity approximately 25' in diameter. The fire went out by itself on September 2, though gas continued to flow. Water was left in the hole to freeze, but the gas continued to flow for more than a year.

A photo shows gas bubbling out of the crater after the rig had been hauled off. There is no evidence in the photo of a wellhead, casing or remaining rig equipment.

Sources: 2, 20, 22

SIMPSON CORE TEST # 26
U.S. NAVY

The Simpson Core Test # 26 was spudded on August 13, 1950 near Simpson Lagoon on the Western North Slope. The operator was drilling ahead at 306' when oil began to flow from the well. No casing or conductor had been set. Oil filled the mud pit and covered the area around the rig with about a foot of fluffy gas cut oil. The mud in the drill pipe became partly frozen and fairly large ice crystals were observed in the oil. The oil flow decreased as the hole continued to freeze. The operator reamed the frozen hole to 295' and circulated 12.7 ppg mud. This killed the well for approximately an hour, but it then began to flow again. Reports indicate that drilling was shut down for 7 days while cementing equipment was installed and rig engine repairs were made. It is assumed the well continued to flow oil during this period. Upon resumption of operations, 14.2 ppg mud was circulated into the well but the well continued to flow some gas-cut mud. The pump had difficulty circulating the gas- and oil-cut mud and, as circulation decreased, the hole froze up again. After reaming the frozen hole, drilling operations recommenced.

While drilling at 509', the well again flowed oil to the surface, but was stopped with the pumping of 12.0 ppg mud into the hole. Drilling continued to 895' during which time the drill pipe twisted off twice. The well froze again during the second fishing operation and ice was reamed from the surface to 350' to enable setting casing. Fresh water was used for reaming and oil continued to flow from the well. At 350', "heavy mud" (density unknown) was circulated into the well. No heavy mud returned, but the oil flow ceased. 8-5/8" casing was run to 350' and cemented. The well was then drilled to 1,171' TD with no further well control incidents.

Sources: 20, 22

GUBIK # 2
U.S. DEPARTMENT OF THE NAVY

The Gubik #2 well was spudded in on Sept. 11, 1951 on the Western North Slope, northeast of Umiat. With the well at 120', surface casing was run consisting of 101' of 16 ½'', 47lb., slip-joint welded casing. The top 40' was jacketed with 23" casing. The casing was cemented to surface with 100 sacks of Cal-Seal.

At 810', intermediate casing was run consisting of 34 joints of 11 ¾'', 47 lb, 8 round casing. The casing was cemented with 8 bbls of 15 percent by weight salt brine, 40 bbls of diesel oil, and 200 sacks of Hi-Early cement.

On December 5, with the well at 4,620' the hole was plugged back with cement from 2300' - 2200' approximately. The operator started out of the hole intending to run in with a 10-5/8'' bit to dress off the cement to 2200'. With three stands of drill pipe still in the slips, the well started to flow mud and immediately went out of control.

An attempt was made to close the pipe rams around the drill pipe, but mud and gas continued blowing out at an undiminished rate. It was later found that the blowing wellbore fluids had lifted the pipe out of the slips and dropped it into the hole. Gas continued to flow and, after an estimated five minutes, the well ignited and the rig collapsed three or four minutes later. The well sanded up in a few hours, but enough gas, thought to originate in a shallower sand, continued to escape from the casing to maintain a flame 4' to 6' high.

Two days after the original blowout, the well again blew out with volume and force about the same as the first time, but it again sanded up within a few hours and continued to burn with a flame about 4' or 5' high. Wreckage was cut away with a torch before extinguishing the blaze in order to remove the Shaffer gates, which were still usable. After the blaze was extinguished with carbon dioxide, the hole was filled with water above the bridge and allowed to freeze. The 204 bbls of water required to fill the well indicated the bridge was at approximately 1,800'.

It was impossible to set plugs between the various gas sands logged above 1,800'; therefore, there is only a bridge of sand or fill to prevent the movement of high-pressure gas from the 1,800' sand upward to any of the various shallower permeable sands beginning at 1,134'. The well was abandoned on December 14, 1951 with the following wellhead equipment in place: from the bottom up, starting at the cellar floor, there is an 11-¾'' landing base, 11-¾'' landing spool, adapter flange, 10-¾'' x 3'' swedge, and a 3'' plug valve.

The only zone in this well that showed by formation test to have high pressure, large volume gas was between 1,810' and 1,858'. This zone was also the only one on the resistivity log about which there could be no question of the content being oil or gas.

Sources: 2, 4, 14, 15, 18, 23, 27

KAVIK # 1
PAN AMERICAN PETROLEUM CORP.

On March 17, 1969 there was a blowout and fire at the Kavik #1, located on the Eastern North Slope next to the Canning River. Five days after the incident, two members of the AOGCC flew to the location and interviewed various people about what had happened. The information was written in a memo to the Alaska Oil and Gas Conservation Commission's (AOGCC) well file and dated March 27, 1969. It is this report, supplemented by interviews with people present at the time that serve as the sources for the following account.

With 13-3/8'' casing set at approximately 3,000', drilling was underway at approximately 4,300'. The operator had encountered a gas stringer at 4,100' as well as a lost circulation zone while drilling 12-¼'' hole. The operator was pulling out of the hole and had reached the BHA when gas pressure under the drill collars in the rotary table blew the drill collars out of the hole and through the crown. A witness on the rig floor saw a rock strike a piece of steel, which caused a spark that set the gas on fire inside the derrick. All flame was confined to the inside of the derrick.

As soon as the well blew out, the Operator's Representative closed the annular preventer, thinking the collars were still in the hole, however the fire continued to burn. An off-duty driller saw what was happening, ran under the floor and closed the blind rams. This immediately extinguished the fire. The fire had burned for approximately 2 to 2-½ minutes prior to being extinguished.

The fire resulted in injury to the derrick man. He was on the monkey boards and was wearing heavy clothing and an arctic facemask, but no gloves. When the well blew out, mud and rocks were blown up through the derrick covering the derrick man in mud. The flame from the fire coming up through the derrick was quite hot. As he started down the ladder, he found the steel too hot to hold on to. He climbed back to the monkey boards and slid down the dead line of the drilling cable, holding on with his bare hands. The drop was approximately 90'. The fire had been extinguished by the time he had returned to the monkey boards and crewmen had attempted to convince him that there was no more danger, but he was very excited and frightened and wanted to get down the fastest way possible. He suffered serious burns to his hands, but no other serious burns to the rest of his body.

The rig was under repair for approximately two weeks after the incident. A snubbing unit was brought in to kill the well, and later drilling resumed without further incident.

None of the information sources could offer more than speculation as to the cause of the blowout.

Sources: 14,18

NGI-7

ARCO Alaska, Inc.

In 1976, while completing Prudhoe Bay gas injector NGI-7 with a drilling rig, a leak path developed at the bottom of the 7" production liner. With three joints of a 7" circulating string in the hole, the well started to unload diesel completion fluid. The blind rams were closed on a strong gas flow but the rams failed 20 minutes later. The annular preventer was closed, but the rig crew had been unable to stab a safety valve on the 7" and the well blew out dry gas and condensate through the circulating string. Well control was eventually regained by plugging the flow with a hydrate plug and performing a top kill via the lubricate-and-bleed method.

Source: 16

CPF1-23
ARCO ALASKA, INC.

CPF1-23 was spudded on 8/23/79 as a water injection well near the Kuparuk Base Camp. The 12-¼" surface hole had been drilled to a depth of 2,249' and the drill string was being brought out of the hole in preparation for running surface pipe. Seven stands (651') of HWDP and 6 drill collars (184') and bit were still in the hole when the well started to unload. The two 6" diverter valves were opened and the diverter was closed. An AOGCC representative reported the well blew 9.3 to 9.6 ppg drilling mud and gravel out of the well bore and through the diverter. Approximately nine hours later the well was still blowing gas with 6 to 10 psi on the diverter lines.

Two attempts to pump mud through a 4" port below the 6" diverter line outlets were moderately successful. 125 bbls of 15.0 lb/gal was pumped down the annulus with approximately 35 to 50 bbls staying in the well bore and the remaining being blown out through the diverter by the gas. In a second attempt approximately one hour later, 508 bbls of 14.5 lb/gal mud were pumped down the annulus. Half of the mud stayed in the well bore while the other half was blown out through the diverter. The gas pressure on the diverter lines had diminished to 3 - 4 psi.

Gas pressure on the diverter lines declined 0.5 to 1 psi over the next 24 hrs. Very weak gas bubbling was observed in the cellar around the outside of the conductor.

A circulating head and Schlumberger wire line preventers with 1-¼" ram blocks were rigged up on top of the 5" drill pipe. 1-¼" tubing was run into the drill pipe while circulating 140 degree, 14.5 lb/gal mud to clean out frozen material. The mud was then displaced out of the drill pipe with a 50/50 mixture of glycol and water. The 1 ¼" tubing was pulled out of the drill pipe and laid down. Circulation down the drill pipe was established, but after 10 – 12 bbls were pumped the jets in the bit plugged. The hole was filled through the annulus with 138 bbls of mud and stood full with no signs of gas. Schlumberger was rigged up and the drill collars were perforated at 650'. The well was circulated with mud and the remainder of the BHA was pulled out and laid down. A new BHA was picked up and run in the hole. The hole was reamed to 1,704' where circulation was lost. The hole was displaced with lighter mud and returns were regained. After washing and reaming to 2250', logs were run and 10-¾" surface casing was set.

No other well control problems were encountered while drilling the well.

Sources: 14, 27

F-20

BP Exploration (Alaska), Inc.

In 1986, an intersection of Prudhoe Bay Well F-9 by Well F-20 caused a subsurface blowout and gas percolation in well cellars. Communication between the two wells occurred when the drill string in F-9 wore a hole through the surface casing and production tubing. The incident was controlled with cement plugs in F-9 and a top kill in F-20.

Source: 16

J-23

BP Exploration (Alaska), Inc.

Well J-23 was being completed in the Prudhoe Bay Field in 1987 when an annular gas flow occurred. Gas percolated up through the well cellar under the rig. The gas source was determined to be the Seabee Formation. The flow path was believed to be up the 9-5/8'' intermediate casing annulus (the cement top was below the hydrocarbon-bearing Seabee Fm.) to the 13-3/8'' surface casing, and then up the outside of the 13-3/8'' to the cellar. Remedial cement work was performed which successfully shut off the gas flow.

Source: 16

Cirque # 1

ARCO Alaska, Inc.

Cirque #1 was an exploration well spudded during the winter of 1992 on the Central North Slope southwest of the Kuparuk River Field. A conductor and diverter had been set and, while tripping out of the hole to run surface casing, a gas kick was swabbed in. The well kicked out all the drilling mud and the diverter was closed as the crew abandoned the rig. Dry gas flowed from the well at a high rate, but there was no fire or explosion. Attempts were made to kill the well using the rig equipment on location, but the lines had all frozen when the rig was shut down upon the well blowing out. A relief well was spudded and was nearing TD when a top kill, possibly aided by the blowing well bridging itself off was successfully achieved.

Source: 16

1-53/Q-20

BP Exploration (Alaska), Inc.

Well 1-53 was drilled in 1994 in the Endicott Field. During intermediate hole drilling operations, a 33 bbl gas kick was taken from the Kekituk Reservoir. After shutting the well in, gas broached to the surface in the cellar of well 1-53 and adjacent wells. Flow from the well was sent to the process plant while a dynamic kill was designed and successfully implemented.

Source: 16

WELL CONTROL INCIDENT NARRATIVES

Alaska State A-1
Tunalik Test Well #1
PBU 15-21
Challenge Island #1
L5-36
KRU 1H-15
KRU 3F-19

ALASKA STATE A-1
EXXON

Alaska State A-1 was spudded on March 15, 1975 on Flaxman Island on the Eastern North Slope. On June 6, 1975, with 13-3/8" casing cemented at 3,378', the operator was coring at 12,463' when an abnormal pressure zone was encountered. The 11.4 ppg mud was gas cut and the well was shut in with SICP 430 and SIDPP 200. The mud weight was raised to 12.0 ppg and the well was killed through the core barrel. A temperature log was run to ensure no subsurface flow between zones.

After working the circulating mud weight up to 13.3 ppg, 135 bbls of 19.0 ppg mud was spotted at the bottom of the well with 185 bbls of 17.0 ppg mud spotted above that in order to stabilize the well sufficiently to allow wireline logging. After successfully logging the open hole, another 235 bbl, 20.0 ppg pill was spotted in the well and the hole above the pill conditioned with 13.3 ppg mud in preparation for running 9-5/8" casing. Circulation was lost, but then regained after pumping LCM. 16.5 and 15.0 ppg mud was spotted on bottom and the well conditioned at the casing shoe with 12.8 ppg mud.

There followed 2 weeks of attempting to balance circulating with kill weight mud and solve lost circulation problems. Forty-four days after experiencing the first gas kick, 9-5/8" casing was finally run and cemented at 11,076' in spite of consistent oil-and-gas cut mud.

Additional abnormal pressures were encountered while drilling 8-½" hole. Varying mud weights were used until a 7" liner was set at TD.

Source: 14

TUNALIK TEST WELL # 1
U.S. GEOLOGICAL SURVEY

The Tunalik Test Well #1 was drilled from November 9, 1978 to January 7, 1980 on the Western North Slope near Icy Cape. Several kicks and drilling breaks were experienced in this well prior to running 13-3/8" casing, but the most significant well control problem occurred while drilling12-1/4" hole at a depth of 12,557'.

On 4/9/79, with 13-3/8" casing set at 8,298', the operator was drilling ahead at 12,557' with 13.5 ppg mud in the hole and stopped to check for flow. The well was flowing, so the operator recorded drill pipe and casing pressures, increased the mud weight to 14.5 ppg and circulated it into the well.

The well continued to flow, so the operator raised the mud weight to 14.8 ppg, but started experiencing lost circulation while pumping it. The rate and pressure down the drill pipe were decreased and full returns were regained. However, the mud came back cut in weight.

For the next 53 days the operator alternated varying kill mud weights with pumping rates and pressures in attempting to kill the well while experiencing varying degrees of lost circulation. Finally, on 5/29/79 a cement plug was spotted from 12,557' to 12,357' and 12,385' of 9-¾" casing was successfully run on 6/5/79. No other significant well control problems occurred after the 9-¾" casing was set and cemented.

Sources: 4, 8, 10

D.S. 15-21
ARCO ALASKA, INC.

Prudhoe Bay Unit Well 15-21 experienced a kick that is not particularly notable among others that have been circulated out of North Slope wells. It is significant enough to be included here because: 1) it kicked while running casing and, 2) there are numerous anecdotal references to it among people interviewed about historical North Slope well control problems.

Well 15-21 was spudded on 10/6/80 on Prudhoe Bay Unit Drillsite 15. 9-5/8" casing had been set at 10,838' and 8-1/2" hole drilled to 11,860'. The operator was running approximately 1,400' of 7" liner on drill pipe and the liner shoe was at 9,920' when the well began to kick. The well was shut with the annular preventer around the drill pipe and pressures taken. The well was killed with 11.3 ppg mud, then the BOPs were opened.

While the hole was being conditioned with 11.3 ppg kill-weight mud, the well kicked again with the mud weight being cut to 10.6 ppg. The mud weight was increased to 11.5 ppg and the well killed again with minor mud losses to the hole being experienced. LCM was pumped to cure the lost circulation problem and the liner was run to TD and cemented. There were no further well control problems experienced in this well.

Sources: 9, 13, 14, 27

CHALLENGE ISLAND #1
SOHIO ALASKA PETROLEUM CO.

The Challenge Island #1 well was drilled on the Eastern North Slope from Challenge Island, northwest of Point Thomson. On February 1, 1981, with 9-5/8" casing set at 10,393', the operator was drilling ahead at 13,587' with 15.4 ppg mud when circulation was lost. Pumping LCM and lowering the mud weight to 15.0 ppg resulted in temporary and sporadic relief from lost circulation, but allowed the well to flow.

Flow increased while mixing mud to 15.0 ppg and circulating bottoms up from the 9-5/8" casing shoe. The well was shut in with 900 psi SICP and 900 psi SIDPP. Annulus returns contained an oil/water ratio of 6.5/100.

15.4 ppg mud was mixed and pumped as quickly as possible. However, well control efforts extended over a period of 5 days, hampered by difficulties in handling the gas-cut mud at the surface, inability to pump down the annulus and a plugged choke. Pressure-related line failures and BOP stack leaks at the surface began to occur as the casing pressure climbed erratically upward. Finally, with the SICP at 5,500 psi, the SIDPP at 450 psi, the annulus packed off and the BOPs leaking, the operator decided to abandon the well.

With the bit at 10,266', the drill pipe was perforated and the well cemented via the perforations. Three weeks were spent abandoning the well, complicated by continuing well control problems, fishing operations and lost circulation.

Sources: 1, 6

L5-36
ARCO ALASKA, INC.

On April 10, 1989, while drilling ahead in the Lisburne Field at 11,849', circulation was lost and the drill string became stuck. Jarring operations commenced while attempting to keep the hole filled on the backside. A total of 600 bbls of 9.8 ppg mud was lost. Partial returns were eventually regained.

The pipe was freed and the well started to flow. The well was shut in and 9.6 ppg mud was circulated through the choke. The initial shut in pressures were SICP 275, SIDPP 0, with gas back to surface.

Over the following 72 hours attempts were made to kill the well with gas being vented through the choke and gas buster, but the operator was unable to regain control with mud. Finally, the drill pipe was perforated and the well killed by pumping cement through the perforations. This required three attempts. Data obtained through research is unclear on whether this well was abandoned or sidetracked.

Sources: 14, 27

3F-19
ARCO ALASKA, INC.

Well 3F-19 was being drilled in the Kuparuk River Field on June 26, 1996 when the well kicked at 7901' with 10.7 ppg/mud in the hole. Three days were spent gradually weighting up the mud to 12.6 ppg and circulating until the well was killed.

Once the well was killed, a short trip was conducted, the remaining 300' of hole was drilled, and 7" casing was run without further incident.

Sources: 27

1H-15
ARCO ALASKA, INC.

Well 1H-15 was being drilled in the Kuparuk River Field on January 17, 1993 when, at 9,711', the driller noticed a pit increase. The well was shut in with SIDPP 400, SICP 800. Three days were spent gradually weighting up the mud to 12.0 ppg and circulating until the well was killed and drilling resumed.

Sources: 27

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6) Driskill, Larry, Pers. Comm., former Drilling Superintendent, BPXA

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27) Wondzell, Blair, Pers. Comm., Sr. Petroleum Engineer, AOGCC

#14

Office of the Attorney General
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To: (1) John Norman (2) Dan Seamount (3) Winton Aubert

Fax #:

From: Bob Mintz

Date: 9/14/04

Subject: BOPE req

Pages: 5, including cover sheet

Message: Please review & let me know if they edit

9/16/04 ok. Jody

All suggest changes

APPROVED

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SEP 16 2004
Alaska Oil & Gas Conservation Commission
Anchorage

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SCANNED SEP 16 2004

STATE OF ALASKA, DEPARTMENT OF LAW
LEGISLATION / REGULATIONS SECTION
Dimond Court Building, 6th Floor
P.O. Box 110300, Juneau, Alaska 99811-0300
TEL: (907) 465-3600 FAX: (907) 465-2520

CONFIDENTIAL FACSIMILE

DATE: 9/14/2004 **TIME:** 11:00 AM

PLEASE DELIVER THIS FACSIMILE TO:

1. Rob Mintz, Anchorage AGO, Oil, Gas & Mining Sec. **FAX:** (907) 269-8644
2. _____ **FAX:** _____
3. _____ **FAX:** _____

FROM:

- ☐ David W. Marquez, Supervising Attorney
- ☐ Deborah E. Behr, Legislation Attorney
- ☑ Steve Weaver, Asst. Attorney General
- ☐ B.J. Jordan, Legal Text Editor
- ☐ Kevin Messing, Legal Text Editor
- ☐ Pat VanPool, Law Office Assistant

TOTAL NUMBER OF PAGES 4 **(Includes this coversheet).**

Re: AOGCC regulations re: BOPE (993-04-0159)

Comments: edits are attached for review by you and the client. I relocated the text on weekly tests for BOPE on development or service wells to avoid confusion about which clause the phrase "at time intervals ... thereafter" modified. Please let me know if these edits ~~of them~~ will work; if they do, then I'll prepare the final approval paperwork. Thanks!

If you have any problems receiving this fax, please call: Pat VanPool, (907) 465-3600.

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and, ~~unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance,~~ at time intervals not to exceed each ~~fourteen~~ 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ___/___/_____, Register ___)

Authority: AS 31.05.030

≡ Cafe

however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure-test interval is indicated by a particular drilling rig's BOPE performance;

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, ~~unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance,~~ at time intervals not to exceed each ~~fourteen~~ 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components ~~exclusive of~~ except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

#13

MEMORANDUM STATE OF ALASKA

ALASKA OIL AND GAS CONSERVATION COMMISSION

TO: Regulations Attorney
Legislation/Regulation Section
Department of Law

DATE: August 11, 2004

SUBJECT: Request for Legal Review
Of Regulations Project on
blowout prevention,
20 AAC 25.035 and
20 AAC 25.036

FROM: John K. Norman
Regulations Contact
Department of Administration

We are requesting legal review and approval of the attached final regulations on Blowout Prevention Equipment, which were adopted by Alaska Oil and Gas Conservation Commission.

Enclosed are the following documents:

1. the original and one copy of the final regulations for the Department of Law's use;
2. the original of the signed and dated adoption document;
3. the original of the public notice;
4. the original of the additional regulations notice information form distributed with the notice;
5. the original of the publishers' affidavit of publication;
6. the original of the affidavit of notice;
7. affidavit of commission action;
8. excerpt from unapproved minutes from the August 11, 2004 meeting;

We have worked with Assistant Attorney General Robert E. Mintz on this project.

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

ORDER CERTIFYING THE CHANGES TO
REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION
COMMISSION

The attached three pages of regulations, dealing with blowout prevention equipment under 20 AAC 25, are hereby certified to be a correct copy of the regulation changes that the Alaska Oil and Gas Conservation Commission adopted at its August 11, 2004 public meeting, under the authority of AS 31.05.030, and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

Although no public comments were received, the Alaska Oil and Gas Conservation Commission paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

DATE: August 11, 2004
Anchorage, Alaska

John K. Norman
Chair

FILING CERTIFICATION

I, _____, Lieutenant Governor for the State of Alaska; certify that on _____, 2004 at _____ .m., I filed the attached regulations according to the provisions of AS 44.62.040 – 44.62.120.

_____
Lieutenant Governor

Effective: _____.

Register: _____.

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment, including the following:

> 20 AAC 25.035 and 25.036 are proposed to be amended to change the time intervals for testing blowout prevention equipment, change the types of tests required for blowout prevention equipment, and add a requirement that use of blowout prevention equipment to prevent fluid flow from a well be reported to the AOGCC.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by writing to AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on July 19, 2004.

If you are a person with a disability who may need a special accommodation, auxiliary aid or service, or alternative communication format in order to participate in the process on the proposed regulation, please contact Jody Colombie at (907) 793-1221 by 4:00 p.m., June 15, 2004, to ensure that any necessary accommodations can be provided.

Copies of the proposed regulation changes may be obtained from the AOGCC office, 333 W. 7th Avenue, Anchorage, Alaska 99501, or by telephoning the AOGCC at 907-793-1221, or on the AOGCC website at:

http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: June 17, 2004

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

Published: June 18, 2004
AO-02414043

ADDITIONAL REGULATIONS NOTICE INFORMATION
(AS 44.62.190(d))

1. Adopting agency: Alaska Oil and Gas Conservation Commission.

2. General subject of regulations: blowout prevention equipment.

3. Citation of regulations: 20 AAC 25.035 and 25.036.

4. Reason for the proposed action: updating regulatory requirements in light of experience and information.

5. Program category and BRU affected: Alaska Oil and Gas Conservation Commission.

6. Cost of implementation to the state agency: zero.

7. The name of the contact person for the regulations John K. Norman, Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501, (907) 279-1433.

8. The origin of the proposed action: staff.

9. Date: June 17, 2004

10. Prepared by:

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission
(907) 279-1433

Anchorage Daily News
Affidavit of Publication

1001 Northway Drive, Anchorage, AK 99508

6/18/2004

AD #	DATE	PO	ACCOUNT	PRICE PER DAY	OTHER CHARGES	OTHER CHARGES #2	OTHER CHARGES #3	OTHER CHARGES #4	OTHER CHARGES #5	GRAND TOTAL
200569	06/18/2004	02414043	STOF0330	$195.64						
				$195.64	$0.00	$0.00	$0.00	$0.00	$0.00	$195.64

STATE OF ALASKA
THIRD JUDICIAL DISTRICT

Teresita Peralta, being first duly sworn on oath deposes and says that she is an advertising representative of the Anchorage Daily News, a daily newspaper.

That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on the above dates and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed Teresita Peralta

Subscribed and sworn to me before this date:

June 18, 2004

Notary Public in and for the State of Alaska.
Third Division. Anchorage, Alaska

MY COMMISSION EXPIRES: 09/12/2007

Kimberly A. Kirby

KIMBERLY A. KIRBY NOTARY PUBLIC STATE OF ALASKA My Commission Expires Sept. 12, 2007

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES
IN THE REGULATIONS OF THE
ALASKA OIL AND GAS
CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment, including the following:

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http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: June 17, 2004
/s/: John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

AO-02414043
Publish: June 18, 2004

STATE OF ALASKA)
) ss.
Third Judicial District)

AFFIDAVIT OF NOTICE OF PROPOSED ADOPTION OF REGULATIONS AND FURNISHING OF ADDITIONAL INFORMATION

I, Jody J. Colombie, Special Staff Assistant of Alaska Oil and Gas Conservation Commission, being sworn, state the following:

As required by AS 44.62.190, notice of the proposed adoption of changes to Title 20, Chapter 25 of the Alaska Administrative Code, dealing with blowout prevention equipment, has been given by being

(1) published in a newspaper or trade publication;
(2) furnished to interested persons as shown on the attached list;
(3) furnished to appropriate state officials;
(4) furnished to the Department of Law, along with a copy of the proposed regulations;
(5) electronically transmitted to incumbent State of Alaska legislators;
(6) furnished to the Legislative Affairs Agency, Legislative Library;
(7) posted on the Alaska Online Public Notice System as required by AS 44.62.175(a)(1) and (b) and 44.62.190(a)(1).

As required by AS 44.62.190(d), additional regulations notice information regarding the proposed adoption of the regulation changes described above has been furnished to interested persons as shown on the attached list and those in (5) and (6) of the list above. The additional regulations notice information also has been posted on the Alaska Online Public Notice System.

DATE: July 28, 2004
Anchorage, Alaska

Jody J. Colombie
Special Staff Assistant

SUBSCRIBED AND SWORN TO before me this 28th day of July, 2004.

Notary Public in and for the
State of Alaska
My commission expires: 11/14/06

Mailed 6/17/04

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Tulsa, OK 74136

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Williams Thomas
Arctic Slope Regional Corporation
Land Department
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Barrow, AK 99723

North Slope Borough
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Barrow, AK 99723

Subject: Regulations: Blow Out Prevention Equipment
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 10:55:28 -0800
To: undisclosed-recipients:;
BCC: Con Bunde <senator_con_bunde@legis.state.ak.us>, John Cowdery <senator_john_cowdery@legis.state.ak.us>, Bettye J Davis <senator_bettye_davis@legis.state.ak.us>, Johnny Ellis JR <senator_johnny_ellis@legis.state.ak.us>, Kim S Elton <senator_kim_elton@legis.state.ak.us>, Hollis French <senator_hollis_french@legis.state.ak.us>, Lyda N Green <senator_lyda_green@legis.state.ak.us>, Gretchen G Guess <senator_gretchen_guess@legis.state.ak.us>, Lyman F Hoffman <senator_lyman_hoffman@legis.state.ak.us>, Georgianna Lincoln <senator_georgianna_lincoln@legis.state.ak.us>, Scott Ogan <senator_scott_ogan@legis.state.ak.us>, senator_ben_stevens <senator_ben_stevens@legis.state.ak.us>, senator_gary_stevens <senator_gary_stevens@legis.state.ak.us>, , senator_gene_therriault <senator_gene_therriault@legis.state.ak.us>, senator_thomas_wagoner <senator_thomas_wagoner@legis.state.ak.us>, senator_gary_wilken <senator_gary_wilken@legis.state.ak.us>, mike chenault <representative_mike_chenault@legis.state.ak.us>, sharon cissna <representative_sharon_cissna@legis.state.ak.us>, John Coghill <representative_john_coghill@legis.state.ak.us>, harry crawford <representative_harry_crawford@legis.state.ak.us>, eric croft <representative_eric_croft@legis.state.ak.us>, nancy dahlstrom <representative_nancy_dahlstrom@legis.state.ak.us>, richard foster <representative_richard_foster@legis.state.ak.us>, les gara <representative_les_gara@legis.state.ak.us>, Carl Gatto <representative_carl_gatto@legis.state.ak.us>, max gruenberg <representative_max_gruenberg@legis.state.ak.us>, david guttenberg <representative_david_guttenberg@legis.state.ak.us>, John Harris <representative_john_harris@legis.state.ak.us>, mike hawker <representative_mike_hawker@legis.state.ak.us>, cheryll heinze <representative_cheryll_heinze@legis.state.ak.us>, Jim Holm <representative_jim_holm@legis.state.ak.us>, reggie joule <representative_reggie_joule@legis.state.ak.us>, mary kapsner <representative_mary_kapsner@legis.state.ak.us>, Beth Kerttula <representative_beth_kerttula@legis.state.ak.us>, vic kohring <representative_vic_kohring@legis.state.ak.us>, Albert Kookesh <representative_albert_kookesh@legis.state.ak.us>, pete kott <representative_pete_kott@legis.state.ak.us>, Bob Lynn <representative_bob_lynn@legis.state.ak.us>, Beverly Masek <representative_beverly_masek@legis.state.ak.us>, lesil mcguire <representative_lesil_mcguire@legis.state.ak.us>, kevin meyer <representative_kevin_meyer@legis.state.ak.us>, carl morgan <representative_carl_morgan@legis.state.ak.us>, carl moses <representative_carl_moses@legis.state.ak.us>, dan ogg <representative_dan_ogg@legis.state.ak.us>, norman rokeberg <representative_norman_rokeberg@legis.state.ak.us>, ralph samuels <representative_ralph_samuels@legis.state.ak.us>, paul seaton <representative_paul_seaton@legis.state.ak.us>, Bill Stoltze

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3rd_revision_regulation.doc	**Content-Type:** application/msword **Content-Encoding:** base64

BOPE second notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Second Additional Regulation Notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)
)

AFFIDAVIT OF COMMISSION ACTION

I, John K. Norman, Chair of the Alaska Oil and Gas Conservation Commission, being duly sworn, state the following:

The attached motion dealing with blowout prevention equipment was passed by the Alaska Oil and Gas Conservation Commission during the August 11, 2004 meeting.

Date: August 11, 2004
Anchorage, Alaska

John K. Norman
Chair

SUBSCRIBED AND SWORN TO before me this 11th day of August, 2004.

Notary Public in and for the
State of Alaska
My commission expires: 11/11/06

ALASKA OIL AND GAS CONSERVATION COMMISSION MEETING
August11, 2004
Excerpt From Unapproved Minutes

Commissioner Daniel Seamount moved and Chair John K. Norman seconded the following motion:

"I move to adopt the changes to 20 AAC 25.035 and 20 AAC 25.036, dealing with blowout prevention equipment, as written in the August 11, 2004 draft regulations."

The motion carried unanimously.

#12

Alaska Oil and Gas Conservation Commission
August 11, 2004 at 9:00 am – Public Meeting Minutes

Attendees

John Norman	Chairman
Daniel T. Seamount, Jr.	Commissioner
Jody Colombie	Special Staff Assistant
Linda Berg	Administrative Manager
Winton Aubert	Sr. Petroleum Engineer
Steve Davies	Sr. Petroleum Geologist
Howard Okland	Geologist Assistant
Helen Warman	Administrative Clerk II
Theresa Rockhill	AOGA
Harry Engel	BP Exploration (Alaska), Inc.
Jerome Eggemeyer	ConocoPhillips (Alaska), Inc.
Erin Kamm	Boy Scout

1. **Approve minutes**

Approve minutes from July 7, 2004

Norman: Minutes July 7, 2004

Seamount: Motion to approve minutes of July 7, 2004

Norman: Seconded

Norman: Minutes July 7, 2004 approved

Approve minutes from July 14, 2004

Norman: Minutes July 14, 2004

Seamount: Motion to approve minutes of July 14, 2004

Norman: Seconded

Norman: Minutes July 14, 2004 approved

Approve minutes from July 21, 2004

Norman: Minutes July 21, 2004, quorum not present

Seamount: Approve minutes of July 21, 2004

Approve minutes from August 6, 2004

Norman: Minutes August 6, 2004, Commissioner Seamount absent and quorum not present

Norman: Approves August 6, 2004

2. Staff member team activity presentations

Seamount: Team Reporting.

Aubert: East Team Report. Reporting for the East Team. There were 3 permits to drill and 2 sundry applications approved this week.

Davies: West Team Report. There were 3 permits to drill and 1 sundry application approved. West team is also working on 2 spacing exceptions, 1 conservation order, 1 enhanced recovery and 1 aquifer exemption

3. **Schedule of Costs and Fees for Documents Well History Files on CD's and printed copies of maps color and oversized**

Norman: Explains the background and reasons for the schedule of the additional fees. Discussion. Effective today the new cost schedule will go into effect and will be posted on the website. This action is pursuant to 6 AAC 96.360 that authorizes agencies to adopt a public schedule of fees. Chairman reads into the record the new fee schedule.

Seamount: Commends Ms. Warman and others who came up with the idea and who worked on the effort. Comments.

Norman: Chairman asks if anyone in attendance has any comments?

Attendees: There were no comments.

Norman: Appropriate to formally approve the proposed schedule of costs dated August 11, 2004.

Seamount: Motion to approve new fee schedule.

Norman: Second. Is there any opposition? Hearing none this cost schedule will become effective immediately.

4. Well Work Operations and Reporting Requirements

Norman: Gives background of reasons for the Task Force. Tom Maunder has been the lead in this effort. Commission would like to get this work completed by the end of the month. After finalizing the report, the Commission will amend Conservation Orders as necessary to eliminate reporting and if there are suggested changes to the regulations the Commission will also review those.

Seamount: Asked Ms. Rockhill how the Task Force was coming along.

Rockhill/AOGA: Spoke to Tom Maunder two days ago and he indicated that he was hoping to get it finalized by Thursday.

5. Adoption of BOPE Regulations

Norman: Lead by Dr. Winton Aubert and Staff at the Commission. They looked at the particular regulations for testing blowout prevention equipment. Based upon the staff report we have prepared an amended regulation.

Aubert: Summarizes the changes in the proposed regulation. Changing the test frequency on development and service class wells from seven days to fourteen days. The other change Commission has proposed is that whenever blowout prevention equipment is used to prevent flow of fluids it must be reported to the Commission. Agency reviewed other regulations from other jurisdictions. There have been actual statistics from Alaska and it turns out the failure rate during tests was very low. Changing the test interval from seven to fourteen days in general will not compromise safety. Discussion.

Norman: There have been no additional comments in the last thirty days. Have e-mailed notice to members of the legislature of the proposed changes. It has been published to solicit any further comments. Asks Special Assistant if there had been any additional comments?

Colombie: There have been no additional comments.

Norman: We are required to take note before voting on any regulatory change, of the cost to private persons of the regulatory action being taken. In this case there will be no additional costs to anyone. We have been told that there will be savings in the millions of dollars based on the fact that the number of blowout prevention equipment tests, as to these wells, will be cut in half. The version of the regulations being adopted is dated August 11, 2004. As a Commission we will vote today to make this change and then the regulatory change package will be submitted to Juneau and entered into the register. In the interim period the Commission will grant waivers upon request to extend the test interval for blowout prevention equipment. We are now ready for the formal vote on 20 AAC 25.035(e)(10) as reflected in the draft dated August 11, 2004. Are there any comments from the audience? No one has asked to comment on the proposed regulation.

Seamount: Move to approve the regulation change.

Norman: Second. Without opposition the motion is approved.

Norman: 20 AAC 25.036(d) regulation is repealed and readopted and a new subsection is added.

Norman: Vote on the new 20 AAC 25.036(d) as set forth in the August 11, 2004 draft.

Seamount: Moves to approve the change.

Norman: Second. Without opposition the motion is approved.

Rockhill/AOGA: Commends the Commission for taking the initiative to make these changes. I know the operators have wanted this change for a number of years.

6. **Review of Regulatory Cost Change for Fiscal Year 2005.**

Norman: Fiscal year 2005 began on July 1, 2004. See AS 31.05.093. Gives background of how the Regulated Well Regulatory Cost Charge is calculated. For the record I will review the current charge and the procedure the agency follows to send notifications to the operators. Charges are apportioned according to the volume of fluid produced and injected and that will be based upon estimates initially, followed with a true-up of the actual amount as soon as actual figures are made available. The total amount of the budget for FY 2005 is $4,136,300.00. There is an additional capital appropriation of $260,000.00 which makes for a total appropriation of approximately 4.4 million dollars. Expect federal receipts of $126,000 from the administration of the underground injection control program under the Federal Safety Drinking Water Act. The estimated permit fee receipts will be approximately $20,000. We estimate savings from last year in the amount of $830,000.00, which will carry forward as a credit against this year's budget. Therefore our estimate for the total AOGCC Regulatory Cost Charge for FY 2005 is $3,420,300. It takes approximately 1 cent per barrel of oil to operate the AOGCC.

The estimated FY 2005 cost assessment by operator is as follows:

Company	Total Estimated Assessment 2005
Aurora Gas LLC	$ 284.56
BP Exploration (Alaska), Inc.	$2,710,504.36
ConocoPhillips (Alaska), Inc.	$ 606,221,72
Evergreen resources (Alaska)	$ 107.82
Forest Oil Corporations	$ 5,288.56
Marathon Oil Company	$ 11,132.30
North Slope Borough	$ 315.91
Phillips Petroleum Company	$ 6,865.33
Pioneer Natural Resources	$ 5.12
Union oil Company of California	$ 74,177.58
XTO Energy Inc. (Cross Timbers)	$ 5,396.74

Norman: The assessment notice for one quarter of the above amounts will be sent this week. Amounts invoiced will be due 30 days from receipt.

Seamount: Comments. Commissioner Palin and I many months ago evaluated how this agency operated how we could cut costs. We came up with a plan that included the elimination of a few positions. We had a large DOE grant last year that helped offset costs as well.

Norman: In response to questions from operators, comments on the Commission operation as a whole and states that he does not foresee any radical changes in his recommendations to the Governor.

Engel/BPXA: Industry feels that the AOGCC is not overstaffed and that the agency is responsive to the needs of the industry. Commends the Commission on doing a great job of changing the BOPE regulation and the resulting cost savings to industry.

Seamount: Motion to approve the estimated Regulatory Cost Charge schedule for FY 2005.

Norman: Seconded. Without opposition the motion is approved.

New Business:

1. Granting Permits to Drill before Spacing Exceptions Orders are Approved

Seamount: The Commissioners have determined that we should not be granting permits to drill before spacing exceptions are approved.

Norman: Issuance of Drilling permits before approval of Spacing Exceptions will not be granted routinely. They will be granted only in rare and compelling circumstances.

Norman: If there is no further business do I have a motion to adjourn?

Seamount: Moves to adjourn.

Norman: Seconded. They're being no further business; the meeting is adjourned at 10:15 am.

Approved by Chair

John K. Norman

8/18/04

Date

#11

STATE OF ALASKA
ADVERTISING ORDER

SEE BOTTOM FOR INVOICE ADDRESS

NOTICE TO PUBLISHER

INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NUMBER. CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE

ADVERTISING ORDER NO.

AO-02414043

FROM	AOGCC 333 W 7th Ave, Ste 100 Anchorage, AK 99501 -	AGENCY CONTACT Jody Colombie	DATE OF A.O. June 17, 2004
		PHONE (907) 793 –1221	PCN
TO	Anchorage Daily News P O Box 149001 Anchorage, AK 99514	DATES ADVERTISEMENT REQUIRED: June 18, 2004 THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN. SPECIAL INSTRUCTIONS: STOF0330 Advertisement to be published was e-mailed	

Type of Advertisement X **Legal** ☐ **Display** ☐ **Classified** ☐ **Other (Specify)**

SEE ATTACHED

SEND INVOICE IN TRIPLICATE TO AOGCC, 333 W. 7th Ave., Suite 100 Anchorage, AK 99501 | PAGE 1 OF 2 PAGES | TOTAL OF ALL PAGES$

REF	TYPE	NUMBER	AMOUNT	DATE	COMMENTS
1	VEN				
2	ARD	02910			
3					
4					

FIN	AMOUNT	SY	CC	PGM	LC	ACCT	FY	NMR DIST	NMR LIQ
1		04	02140100			73540			
2									
3									
4									

REQUISITIONED BY: J Colombie

DIVISION APPROVAL:

02-902 (Rev. 3/94) **Publisher/Original Copies: Department Fiscal, Department, Receiving** AO.FRM

STATE OF ALASKA ADVERTISING ORDER SEE BOTTOM FOR INVOICE ADDRESS	NOTICE TO PUBLISHER INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NO., CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE	ADVERTISING ORDER NO. **AO-02414043**

FROM	AOGCC 333 West 7th Avenue, Suite 100 Anchorage, AK 99501 907-793-1221	AGENCY CONTACT Jody Colombie PHONE (907) 793 -1221	DATE OF A.O. June 17, 2004 PCN
TO	Anchorage Daily News P O Box 149001 Anchorage, AK 99514	DATES ADVERTISEMENT REQUIRED: June 18, 2004 THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN. SPECIAL INSTRUCTIONS:	

AFFIDAVIT OF PUBLICATION

United states of America

State of _____ ss

_____ division.

Before me, the undersigned, a notary public this day personally appeared

_____ who, being first duly sworn, according to law, says that

he/she is the _____ of _____

Published at _____ in said division _____and

state of _____ and that the advertisement, of which the annexed

is a true copy, was published in said publication on the _____ day of

_____ 2004, and thereafter for ____ consecutive days, the last

publication appearing on the _____ day of _____, 2004, and that

the rate charged thereon is not in excess of the rate charged private

individuals.

Subscribed and sworn to before me

This ____ day of _____ 2004,

_____

Notary public for state of _____

My commission expires _____

REMINDER

INVOICE MUST BE IN TRIPLICATE AND MUST REFERENCE THE ADVERTISING ORDER NUMBER.

A CERTIFIED COPY OF THIS AFFIDAVIT OF PUBLICATION MUST BE SUBMITTED WITH THE INVOICE.

ATTACH PROOF OF PUBLICATION HERE.

Subject: RE: Notice
From: legalads <legalads@adn.com>
Date: Thu, 17 Jun 2004 12:01:34 -0800
To: Jody Colombie <jody_colombie@admin.state.ak.us>

Hi Jody:
Following is the confirmation information on your legal notice. Please let me know if you have any questions or need additional information.

Account Number: STOF 0330
Legal Ad Number: 200569
Publication Date(s): June 18, 2004
Your Reference or PO#: 02414043
Cost of Legal Notice: $195.64
Additional Charges
Web Link:
E-Mail Link:
Bolding:
Total Cost to Place Legal Notice: $195.64

Ad Will Appear on the web, www.adn.com:
Ad Will Not Appear on the web, www.adn.com: XXXX

Thank You,
Kim Kirby
Anchorage Daily News
Legal Classified Representative
E-Mail: legalads@adn.com
Phone: (907) 257-4296
Fax: (907) 279-8170

From: Jody Colombie
Sent: Thursday, June 17, 2004 10:56 AM
To: legalads
Subject: Notice

<<File: BOPE second notice.doc>><<File: Second Additional Regulation Notice.doc>>
Please publish the attached tomorrow. Jody

Subject: Regulation
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 10:58:55 -0800
To: Cynthia B Mciver <bren_mciver@admin.state.ak.us>

Please publish on the website. Jody

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BOPE second notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Second Additional Regulation Notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 10:58:07 -0800
To: undisclosed-recipients:;
BCC: Angela Webb <angie_webb@admin.state.ak.us>

Please publish on-line.

BOPE second notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Second Additional Regulation Notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 10:56:31 -0800
To: Legal Ads Anchorage Daily News <legalads@adn.com>

Please publish the attached tomorrow. Jody

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Second Additional Regulation Notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Ad Order
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 11:20:26 -0800
To: Legal Ads Anchorage Daily News <legalads@adn.com>

Attached is the Ad Order for the Notice and Attachment for the blowout prevention equipment.

Ad Order form.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Mailed 6/17/04

Citgo Petroleum Corporation
PO Box 3758
Tulsa, OK 74136

Mary Jones
XTO Energy, Inc.
Cartography
810 Houston Street, Ste 2000
Ft. Worth, TX 76102-6298

David McCaleb
IHS Energy Group
GEPS
5333 Westheimer, Ste 100
Houston, TX 77056

Kelly Valadez
Tesoro Refining and Marketing Co.
Supply & Distribution
300 Concord Plaza Drive
San Antonio, TX 78216

Robert Gravely
7681 South Kit Carson Drive
Littleton, CO 80122

George Vaught, Jr.
PO Box 13557
Denver, CO 80201-3557

Jerry Hodgden
Hodgden Oil Company
408 18th Street
Golden, CO 80401-2433

Richard Neahring
NRG Associates
President
PO Box 1655
Colorado Springs, CO 80901

John Levorsen
200 North 3rd Street, #1202
Boise, ID 83702

Kay Munger
Munger Oil Information Service, Inc
PO Box 45738
Los Angeles, CA 90045-0738

Samuel Van Vactor
Economic Insight Inc.
3004 SW First Ave.
Portland, OR 97201

Michael Parks
Marple's Business Newsletter
117 West Mercer St, Ste 200
Seattle, WA 98119-3960

Mark Wedman
Halliburton
6900 Arctic Blvd.
Anchorage, AK 99502

Schlumberger
Drilling and Measurements
3940 Arctic Blvd., Ste 300
Anchorage, AK 99503

David Cusato
200 West 34th PMB 411
Anchorage, AK 99503

Baker Oil Tools
4730 Business Park Blvd., #44
Anchorage, AK 99503

Ciri
Land Department
PO Box 93330
Anchorage, AK 99503

Jill Schneider
US Geological Survey
4200 University Dr.
Anchorage, AK 99508

Gordon Severson
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Anchorage, AK 99508-4336

Jack Hakkila
PO Box 190083
Anchorage, AK 99519

Darwin Waldsmith
PO Box 39309
Ninilchick, AK 99639

James Gibbs
PO Box 1597
Soldotna, AK 99669

Kenai National Wildlife Refuge
Refuge Manager
PO Box 2139
Soldotna, AK 99669-2139

Penny Vadla
399 West Riverview Avenue
Soldotna, AK 99669-7714

Richard Wagner
PO Box 60868
Fairbanks, AK 99706

Cliff Burglin
PO Box 70131
Fairbanks, AK 99707

Bernie Karl
K&K Recycling Inc.
PO Box 58055
Fairbanks, AK 99711

Williams Thomas
Arctic Slope Regional Corporation
Land Department
PO Box 129
Barrow, AK 99723

North Slope Borough
PO Box 69
Barrow, AK 99723

Subject: Regulations: Blow Out Prevention Equipment
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 17 Jun 2004 10:55:28 -0800
To: undisclosed-recipients:;
BCC: Con Bunde <senator_con_bunde@legis.state.ak.us>, John Cowdery <senator_john_cowdery@legis.state.ak.us>, Bettye J Davis <senator_bettye_davis@legis.state.ak.us>, Johnny Ellis JR <senator_johnny_ellis@legis.state.ak.us>, Kim S Elton <senator_kim_elton@legis.state.ak.us>, Hollis French <senator_hollis_french@legis.state.ak.us>, Lyda N Green <senator_lyda_green@legis.state.ak.us>, Gretchen G Guess <senator_gretchen_guess@legis.state.ak.us>, Lyman F Hoffman <senator_lyman_hoffman@legis.state.ak.us>, Georgianna Lincoln <senator_georgianna_lincoln@legis.state.ak.us>, Scott Ogan <senator_scott_ogan@legis.state.ak.us>, senator_ben_stevens <senator_ben_stevens@legis.state.ak.us>, senator_gary_stevens <senator_gary_stevens@legis.state.ak.us>, , senator_gene_therriault <senator_gene_therriault@legis.state.ak.us>, senator_thomas_wagoner <senator_thomas_wagoner@legis.state.ak.us>, senator_gary_wilken <senator_gary_wilken@legis.state.ak.us>, mike chenault <representative_mike_chenault@legis.state.ak.us>, sharon cissna <representative_sharon_cissna@legis.state.ak.us>, John Coghill <representative_john_coghill@legis.state.ak.us>, harry crawford <representative_harry_crawford@legis.state.ak.us>, eric croft <representative_eric_croft@legis.state.ak.us>, nancy dahlstrom <representative_nancy_dahlstrom@legis.state.ak.us>, richard foster <representative_richard_foster@legis.state.ak.us>, les gara <representative_les_gara@legis.state.ak.us>, Carl Gatto <representative_carl_gatto@legis.state.ak.us>, max gruenberg <representative_max_gruenberg@legis.state.ak.us>, david guttenberg <representative_david_guttenberg@legis.state.ak.us>, John Harris <representative_john_harris@legis.state.ak.us>, mike hawker <representative_mike_hawker@legis.state.ak.us>, cheryll heinze <representative_cheryll_heinze@legis.state.ak.us>, Jim Holm <representative_jim_holm@legis.state.ak.us>, reggie joule <representative_reggie_joule@legis.state.ak.us>, mary kapsner <representative_mary_kapsner@legis.state.ak.us>, Beth Kerttula <representative_beth_kerttula@legis.state.ak.us>, vic kohring <representative_vic_kohring@legis.state.ak.us>, Albert Kookesh <representative_albert_kookesh@legis.state.ak.us>, pete kott <representative_pete_kott@legis.state.ak.us>, Bob Lynn <representative_bob_lynn@legis.state.ak.us>, Beverly Masek <representative_beverly_masek@legis.state.ak.us>, lesil mcguire <representative_lesil_mcguire@legis.state.ak.us>, kevin meyer <representative_kevin_meyer@legis.state.ak.us>, carl morgan <representative_carl_morgan@legis.state.ak.us>, carl moses <representative_carl_moses@legis.state.ak.us>, dan ogg <representative_dan_ogg@legis.state.ak.us>, norman rokeberg <representative_norman_rokeberg@legis.state.ak.us>, ralph samuels <representative_ralph_samuels@legis.state.ak.us>, paul seaton <representative_paul_seaton@legis.state.ak.us>, Bill Stoltze

<representative_bill_stoltze@legis.state.ak.us>, Bruce Weyhrauch <representative_bruce_weyhrauch@legis.state.ak.us>, Bill Williams <representative_bill_williams@legis.state.ak.us>, peggy wilson <representative_peggy_wilson@legis.state.ak.us>, Kelly Wolf <representative_kelly_wolf@legis.state.ak.us>, Donny Olson <senator_donny_olson@legis.state.ak.us>, Ralph Seekins <senator_ralph_seekins@legis.state.ak.us>, Tom Anderson <representative_tom_anderson@legis.state.ak.us>, Ethan Berkowitz <representative_ethan_berkowitz@legis.state.ak.us>, hugh fate <representative_hugh_fate@legis.state.ak.us>, Fred Dyson <senator_fred_dyson@legis.state.ak.us>, Bert K Stedman <senator_bert_stedman@legis.state.ak.us>, Nick Stepovich <representative_nick_stepovich@legis.state.ak.us>, Robert E Mintz <robert_mintz@law.state.ak.us>, Christine Hansen <c.hansen@iogcc.state.ok.us>, Terrie Hubble <hubbletl@bp.com>, Sondra Stewman <StewmaSD@BP.com>, Scott & Cammy Taylor <staylor@alaska.net>, stanekj <stanekj@unocal.com>, ecolaw <ecolaw@trustees.org>, roseragsdale <roseragsdale@gci.net>, trmjr1 <trmjr1@aol.com>, jbriddle <jbriddle@marathonoil.com>, rockhill <rockhill@aoga.org>, shaneg <shaneg@evergreengas.com>, jdarlington <jdarlington@forestoil.com>, nelson <nelson@gci.net>, cboddy <cboddy@usibelli.com>, Mark Dalton <mark.dalton@hdrinc.com>, Shannon Donnelly <shannon.donnelly@conocophillips.com>, "Mark P. Worcester" <mark.p.worcester@conocophillips.com>, "Jerry C. Dethlefs" <jerry.c.dethlefs@conocophillips.com>, Bob <bob@inletkeeper.org>, wdv <wdv@dnr.state.ak.us>, tjr <tjr@dnr.state.ak.us>, bbritch <bbritch@alaska.net>, mjnelson <mjnelson@purvingertz.com>, Charles O'Donnell <charles.o'donnell@veco.com>, "Randy L. Skillern" <SkilleRL@BP.com>, "Jeanne H. Dickey" <DickeyJH@BP.com>, "Deborah J. Jones" <JonesD6@BP.com>, "Paul G. Hyatt" <hyattpg@BP.com>, "Steven R. Rossberg" <RossbeRS@BP.com>, Lois <lois@inletkeeper.org>, "Joseph F. Kirchner" <KirchnJF@BP.com>, Gordon Pospisil <PospisG@BP.com>, "Francis S. Sommer" <SommerFS@BP.com>, Mikel Schultz <Mikel.Schultz@BP.com>, "Nick W. Glover" <GloverNW@BP.com>, "Daryl J. Kleppin" <KleppiDE@BP.com>, "Janet D. Platt" <PlattJD@BP.com>, "Rosanne M. Jacobsen" <JacobsRM@BP.com>, ddonkel <ddonkel@cfl.rr.com>, Collins Mount <collins_mount@revenue.state.ak.us>, mckay <mckay@gci.net>, Barbara F Fullmer <barbara.f.fullmer@conocophillips.com>, bocastwf <bocastwf@bp.com>, Charles Barker <barker@usgs.gov>, doug_schultze <doug_schultze@xtoenergy.com>, Hank Alford <hank.alford@exxonmobil.com>, Mark Kovac <yesno1@gci.net>, gspfoff <gspfoff@aurorapower.com>, Gregg Nady <gregg.nady@shell.com>, Fred Steece <fred.steece@state.sd.us>, rcrotty <rcrotty@ch2m.com>, jejones <jejones@aurorapower.com>, dapa <dapa@alaska.net>, jroderick <jroderick@gci.net>, eyancy <eyancy@seal-tite.net>, "James M. Ruud" <james.m.ruud@conocophillips.com>, Brit Lively <mapalaska@ak.net>, jah <jah@dnr.state.ak.us>, Kurt E Olson <kurt_olson@legis.state.ak.us>, buonoje <buonoje@bp.com>, Mark Hanley <mark_hanley@anadarko.com>, loren_leman <loren_leman@gov.state.ak.us>, Julie Houle <julie_houle@dnr.state.ak.us>, John W Katz <jwkatz@sso.org>, Suzan J Hill <suzan_hill@dec.state.ak.us>, tablerk <tablerk@unocal.com>, Brady <brady@aoga.org>, Brian Havelock <beh@dnr.state.ak.us>, bpopp <bpopp@borough.kenai.ak.us>, Jim White <jimwhite@satx.rr.com>, "John S. Haworth" <john.s.haworth@exxonmobil.com>, marty <marty@rkindustrial.com>, ghammons <ghammons@aol.com>, rmclean <rmclean@pobox.alaska.net>, James Scherr <james.scherr@mms.gov>, mkm7200 <mkm7200@aol.com>, Brian Gillespie <ifbmg@uaa.alaska.edu>, David L Boelens <dboelens@aurorapower.com>, Todd Durkee <TDURKEE@KMG.com>, Gary Schultz <gary_schultz@dnr.state.ak.us>, Wayne Rancier <RANCIER@petro-canada.ca>, Bill Miller

<Bill_Miller@xtoalaska.com>, Brandon Gagnon <bgagnon@brenalaw.com>, Raymond Matiashowski JR <raymond_matiashowski@admin.state.ak.us>

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Alaska Oil and Gas Conservation Commission
333 West 7th Avenue, Suite 100
Anchorage, AK 99501

Mailed 6/17/04

Deborah Behr
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Department of Law
PO Box 110300
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Alaska Oil and Gas Conservation Commission
333 West 7th Avenue, Suite 100
Anchorage, AK 99501

Mailed 6/17/04

Legislative Affairs Agency
Legislative Reference Library
State Capitol Room 3
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6/16/2004 Version

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

2 TABS

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a well classified as "development" or "service" and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test" and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function-tested at least every thirty days;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours prior notice of each BOPE pressure test shall be provided to the commission so that a commission representative can witness the test;

(11) instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of use.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036 (d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

TAB 1

(1) when installed, repaired, or changed on a well classified as "development" or "service" and. unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test" and at least once a week thereafter, BOPE, including emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-

compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing shall be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function-tested at least every thirty days;

(6) test results shall be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours prior notice of each function pressure-test shall be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) Instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of such use. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

#9

June 16, 2004 at 9:05 am – Public Meeting

ATTENDEES

John K. Norman	Chair
Daniel Seamount	Commissioner
Jody Colombie	Special Staff Assistant
Winton Aubert	Senior Petroleum Engineer
Steve Davies	Senior Petroleum Geologist
Linda Berg	Administrative Manager
Rob Mintz	Assistant Attorney General

Agenda:

Old Business

1. Approve Minutes of June 2, 2004 meeting
2. Staff member team activity presentations
3. Adoption of BOPE Regulation

1. Approve minutes from June 2, 2004

Norman: Minutes June 2, 2004

Seamount: Motion to approve minutes of June 2, 2004

Norman: Seconded

Norman: Minutes June 2, 2004 approved

2. Staff team activity reports

Seamount: Team Reporting.

Seamount: East Team Report.

Aubert: There were 4 permits to drill and 2 sundry applications approved this week.

Seamount: West Team Report.

Davies: There were 6 permits to drill and 4 sundry applications approved this week. Hearing last week on Envirotech's application for an Aquifer Exception order relating to the North Foreland Field. The record on this application is open until June 25, 2004. The Commission requested additional information from the applicant.

3. **Blow Out Prevention Equipment Regulations**

Norman: Blow Out Prevention Regulation Hearing. The hearing was on June 8, 2004. Commission staff testified. Chair gives brief explanation of proposed regulation. Staff study has shown that safety will not be compromised by increasing required interval between BOPE tests. Changing the test intervals from 7 to 14 days will also be a cost savings to the operators and private individuals in the millions of dollars. It usually takes a minimum of 4 hours per rig to perform a BOPE test.

Aubert: The operators at Prudhoe Bay estimate a .5 a million dollar saving per rig. One-fourth of the rigs in Alaska are located on the North Slope.

Seamount: Notes that the purpose in changing this regulation is to increase efficiency and to minimize the risk to personnel doing the test.

Norman: Any further discussion with respect to the adoption? None.

Voting: Seamount – Yes.
Norman – Yes.

4. Geological Materials Center

Seamount: As a reminder we were going to submit support letters from industry to Senator Stevens for the support of funding for the Alaska Geological Material Center. We should add this to next week's agenda and invite AOGA to attend. Commissioner requests Special Assistant to do this.

5. Flags

Berg: The flags have been purchased and installed.

6. Panic Button

Berg: Has contacted Guardian Security and they will submit a price quote for installation.

7. **Processing of Permits to Drill and Sundry Applications**

Colombie: I will be processing these for a couple of weeks so that Linda Laasch can get caught up with her job duties.

Norman: If there is no further business do I have a motion to adjourn?

Seamount: Moves to adjourn.

Norman: Seconded. They're being no further business; the meeting is adjourned 9:40 am

Approved by Chair

John K. Norman
6/30/04
Date

#8

Thank you Jim.
We will enter a copy of this e-mail in the record to supplement your testimony.

James Regg wrote:

> There is one other reporting obligation that is new in the proposed regulation that I did not mention this morning -- instances of BOPE use to prevent the flow of fluids from a well must be reported to the Commission within 24 hours.
>
> Jim Regg
> AOGCC
> Petroleum Engineer

7

STATE OF ALASKA
OIL AND GAS CONSERVATION COMMISSION

BLOW OUT PREVENTION EQUIPMENT REGULATION HEARING

June 8, 2004 9:00 am

NAME – AFFILIATION	ADDRESS/PHONE NUMBER	TESTIFY (Yes or No)
(PLEASE PRINT)		
Jim Regg	AOGCC 793-1236	Yes
MG Mumbert	" 1231	N
Serena Eggemeyer	CPA	N
Tom Maunder	AOGCC 793-1250	No

\Hearing_Sign-In

#6

ALASKA OIL AND GAS CONSERVATION COMMISSION

PUBLIC HEARING

In Re:)
)
Proposed Regulations)
Blowout Prevention Equipment.)
)

TRANSCRIPT OF PROCEEDINGS

Anchorage, Alaska
June 8, 2004
9:02 o'clock a.m.

COMMISSIONERS:

JOHN NORMAN, Chairperson
DAN SEAMOUNT

* * * *

METRO COURT REPORTING
745 West Fourth Avenue, Suite 425
Anchorage, Alaska 99501
(907) 276-3876

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* * *

P R O C E E D I N G S

(On record 9:02 a.m.)

CHAIRMAN NORMAN: This hearing is called to order. This is a hearing before the Alaska Oil and Gas Conservation Commission. The date is Tuesday, June 8, 2004. The time is approximately 9:03 a.m. The location is at the Commission's offices at 333 West Seventh Avenue, Anchorage, Alaska. Present is myself, Chairman of the Commission, John Norman. Also present is Commissioner Dan Seamount. A quorum is present, and we will proceed with the meeting. Laura Ferro -- am I pronouncing that right?

COURT REPORTER: Yes, sir.

CHAIRMAN NORMAN: Of Metro Court Reporting is here to provide a transcript of the proceedings. The subject of today's hearing is the interval for testing blowout prevention equipment. It is by definition a very important subject. It concerns safety. It also concerns sound practice, and it's something that the Commission is very concerned about. We do not want to require testing of blowout prevention equipment at unnecessarily frequent intervals. At the same time, the Commission must be absolutely satisfied that safety and other good oil field practice will not be compromised.

The subject today is adoption of a regulatory change in Title 20 of Chapter 25 of the Alaska Administrative Code

dealing with blowout prevention equipment. Specifically, the proposed amendment will amend two sections of the Alaska Administrative Code. These are respectively 20 AAC 25.035 and 20 AAC 25.036. Copies of the specific amendments proposed have been available and will be made a part of the record. They will also be discussed specifically later in this hearing.

Essentially, what is proposed is that the regulations and the two sections referenced will be amended to change the required test time interval between testing of blowout prevention equipment from 7 days to 14 days in the specific instances that will be identified and are identified in the proposed regulation. Notice of this hearing was published on April 22, 2004, in the Anchorage Daily News. The Commission has received no written comments. As earlier indicated, this hearing is being recorded, and there will be a transcript made of it. Anyone wishing a copy of the transcript later may obtain that. Likewise, if there's anyone in the audience that wishes to testify, we do have a sign-in sheet and would ask that you sign in so that we can identify you for the record.

Initially, testifying for the Commission will be Mr. Jim Regg, a petroleum engineer. Would you swear in Mr. Regg, please?

COURT REPORTER: Mr. Regg, raise your right hand, please.

(Oath administered)

MR. REGG: I do.

COURT REPORTER: Thank you. State your full name for the record.

MR. REGG: James Regg.

COURT REPORTER: Thank you.

CHAIRMAN NORMAN: Mr. Regg, could you first begin by stating your position and your qualifications?

MR. REGG: Yes, sir. I joined the Commission in 2002 as a staff petroleum engineer. I currently supervise five petroleum inspectors here. I have a Bachelor of Science Degree in Petroleum and Natural Gas Engineering from Pennsylvania State University.

COURT REPORTER: Please clip the mike on.

MR. REGG: Is that better? A Bachelor of Science Degree in Petroleum and Natural Gas Engineering from Pennsylvania State University, and a companion Bachelor of Arts Degree in Math and Natural Sciences from Edinboro State University. My work experience spans 20 years in both Alaska and the Gulf of Mexico evaluating technical issues associated with oil industry operations from a regulatory perspective. Those areas include drilling production, problem well initiatives, and alternate compliance findings. I was part of an MMS industry reliability study that investigated blowout prevention testing, and specifically focusing on a 14-day

versus 7-day test cycle. And in 2001, I was recognized by the National Society of Professional Engineers as MMS Engineer of the Year.

CHAIRMAN NORMAN: Thank you, Mr. Regg. Commissioner Seamount, do you have any questions concerning the qualifications of the witness?

COMMISSIONER SEAMOUNT: I have no questions about his outstanding qualifications.

CHAIRMAN NORMAN: Good. Mr. Regg, then could you proceed in your own manner in whatever order you wish to discuss the background research that has been done by you and others at the Commission staff to establish a baseline of information upon which we might consider a change in the regulatory test interval from 7 to 14 days?

MR. REGG: Thank you. The purpose of my remarks this morning are to present the results of a blowout prevention equipment performance review performed by the Commission. I want to introduce the results into the record, and a copy of that report has been provided to you this morning. Some background before I get into the actual results.

CHAIRMAN NORMAN: Mr. Regg, if I could pause for a moment just for the record again. I have before me the document entitled Review of Historical BOPE Tests, dated May of 2004. And it consists of three primary pages, and then an

appendix. And the appendix consists of it looks like about 10 pages rough- -- approximately. And this will be officially made a part of the record upon conclusion of your testimony.

MR. REGG: Okay. The background to begin, current regulations require function and pressure testing of blowout prevention equipment when installed, repaired, or changed, and at least once per week thereafter. In the past, operators have approached the Commission about changing the test cycle from 7 days to 14 days citing other regulatory jurisdictions such as the Minerals Management Service, the Bureau of Land Management, Norway's Petroleum Safety Administration as examples where longer test cycles have been allowed. In those past discussions there's been no performance data presented to the Commission, and the Commission took no action.

In early 2004, the Commission on its own initiative investigated a 14-day blowout prevention equipment test cycle for the Prudhoe Bay and Lisburne Oil Pools. The results of that investigation were Conservation Orders 516 and 517, respectively. The decision to allow 14-day BOP testing in those two pools for development well drilling only was based on the high degree of geologic control, under-pressure pools, the large kick tolerance provided by the drilling practice, and the lack of well control events. Subsequent to that effort, the Commission has proposed to look at the 14-day BOP

test frequencies on a state-wide basis. That takes us to this point. As part of that effort, we decided that a review of historical BOP performance would be useful.

I next want to talk about the scope of our review. I'll present results, and them I'll make some concluding remarks. The test results that we investigated are from 2001 through April 30 of 2004. The data set includes both operator-witnessed and commission-witnessed BOP tests. The Commission has witnessed approximately 22 percent of the blowout prevention equipment tests during this review timeframe. We believe the test data is representative of actual BOP operating performance.

Test results are routinely submitted to the Commission in a standard format. We review those data for likely errors and omissions including dates, well names, descriptions of the failures, and actual counts of the failures. The effort was designed to develop statistical information from tests. We looked at the number of components tested, the number of failures of all components, the number of failures of critical components, and then the respective failure rates. Critical components were chosen based on the severity of consequences should the component fail during a well control event. Included in that were annular precentors, the pipe rams, blind rams, and the accumulator system.

I next want to draw your attention to page two in the

report. There's a table that summarizes the statistical results of our review. We present the results for each year. And I want to focus you towards the far right column under Totals. Note that the failure rate for all components is 2.16 percent, and for those critical components is 0.42 percent. The failure rates statistics demonstrate a high degree of reliability of BOP equipment. Further reducing the significance of failure statistics are the redundancy within the BOP equipment, the multiple devices capable of shutting off an uncontrolled flow, the redundant controls, mobile paths for returning fluids, operational monitoring, and, of course, the primary means of well control, the drilling fluid.

In our review we were not able to locate any equivalent review of Alaska blowout prevention equipment test data for earlier years to compare our results against. There have been other studies of BOP performance but they're not directly comparable to this review. But those results have -- excuse me, those results have concluded that there is no statistical difference between 14-day and 7-day test intervals. The low rate of failure is reasonable given equipment and operational improvements that occurred since regulations established a BOP test interval and ongoing equipment maintenance practices.

In addition to the technical and performance arguments relative to the changing the test interval, there are

administrative issues and economic considerations. These are beyond the scope of this review but are acknowledged in the report.

Our report does make several specific recommendations based on blowout prevention equipment performance review, which I will defer discussing at this time. And I am willing to address any questions you have about our review. Thank you.

CHAIRMAN NORMAN: Thank you, Mr. Regg, for your work on this and your testimony. Commissioner Seamount, do you have questions?

COMMISSIONER SEAMOUNT: Mr. Regg, this looks like an outstanding study. I just had maybe only one question. The table on page two shows that there is a very high degree of reliability, especially in the critical components. Now these are totals from all BOP tests, is that correct?

MR. REGG: That's correct.

COMMISSIONER SEAMOUNT: Were you able to split out the timing between -- I mean sometimes an extension will be given on a test, and there are some tests in Alaska that -- where the interval is 14 days or longer. Did you go so far as to look at those tests and see if there's any difference between -- in reliability between those and those that were stuck to the regulatory 7-day interval?

MR. REGG: One of our initial goals in doing the statistical review was to capture the time interval between tests so that we could do that. Unfortunately, we don't have good enough data to make a specific statistical presentation of that. We can make a statement that it appears when there are extensions granted, they typically extend a BOP test from 7 days out to about 10 or 11 days. If you look at the other BOP studies that have been done, and I'll reference specifically the one done by the Minerals Management Service, they actually did look at a statistical difference between 7-day BOP testing and 14-day. And they put two different -- they took a set of drilling operations and put those on the different test cycles so they could actually determine that. And they found there was no statistical difference. But from our data we cannot do that at this point in time.

COMMISSIONER SEAMOUNT: Okay. Thank you, Mr. Regg. I have no further questions.

CHAIRMAN NORMAN: Mr. Regg, the table at the top of page two, the statistical table of the BOP tests and results that is spread between 2001 and 2004, what was the distribution of those wells tested? More specifically, is that representative of the entire State of Alaska or is it concentrated in one area and one operator?

MR. REGG: The results are statewide, all BOP tests in the State of Alaska, but as you're aware, the

preponderance of work on the North Slope so the numbers would be skewed toward operations there.

CHAIRMAN NORMAN: On the North Slope does it include though a random distribution of fields such as Alpine and Kuparuk and others outside the immediate Prudhoe Bay area?

MR. REGG: Yeah. Our data includes all BOP tests done in all fields in the State of Alaska during that time frame.

CHAIRMAN NORMAN: And the age of the wells tested, there's a good statistical distribution of the age of the wells tested as well?

MR. REGG: We didn't look at the age of the wells in our consideration.

CHAIRMAN NORMAN: Would the age of the wells have a bearing upon the reliability of the blowout prevention equipment?

MR. REGG: I don't believe so. It's unique to the blowout prevention equipment itself, the rig and the operation.

CHAIRMAN NORMAN: The proposed regulation, in addition to going from 7 days to 14 days, there are some other changes in here. Could you briefly mention the other changes that are addressed in the regulation if you have that before you?

MR. REGG: Yes. One of the changes is that

the regulations right now require a 7-day function and pressure test. The proposed regulation would continue to require a function test weekly, but would also -- would extend the pressure test requirement to 14 days. The requirement is also for development drilling only, which would exclude all exploratory work. I believe that's the extent of the changes that we've proposed.

CHAIRMAN NORMAN: Yes. Thank you. Commissioner Seamount, anything further?

COMMISSIONER SEAMOUNT: Is there a change in reporting requirements?

MR. REGG: There's not a change in the reporting requirements. We would still expect all BOP tests to be reported to the Commission. It will be critical that we do get all reports since -- as well as the notification about a pending BOP test so the Commission has the opportunity to witness those.

COMMISSIONER SEAMOUNT: That's all I have, Mr. Chairman.

CHAIRMAN NORMAN: Okay. Mr. Regg, again, I want to add to Commissioner Seamount's thanks to you for overseeing this study and to all the rest of the staff that worked on it, and others that cooperated and participated in putting it together. Let's see, are there any other persons present today that wish to offer any testimony on this? Okay.

Hearing none, and Commissioner Seamount, with your permission, I'd like to leave the record open in case a comment might come in the mail even though we had a cut-off. I'd like to leave the record open until close of business this Friday, and then we will consider the record finally closed, and the Commissioners will then take action on the proposed regulation.

COMMISSIONER SEAMOUNT: That sounds very appropriate.

CHAIRMAN NORMAN: As earlier indicated, these proceedings will be transcribed, and interested parties may obtain a copy of the proceedings. Attached to a copy of the proceedings will be the written study that has been referred to by Mr Regg. If there's no further business before the Commission, we will adjourn at 9:22 a.m.

(Off record 9:22 a.m.)

*** * * END OF PROCEEDINGS * * ***

C E R T I F I C A T E

SUPERIOR COURT)
)ss.
STATE OF ALASKA)

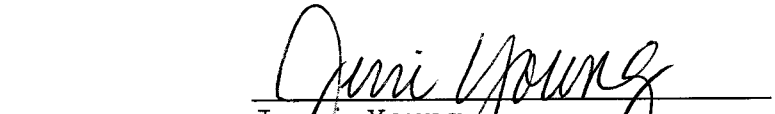
I, Jerri Young, Notary Public in and for the State of Alaska, do hereby certify:

THAT the annexed and foregoing pages numbered 2 through 14 contain a full, true and correct transcript of the Public Hearing before the Alaska Oil and Gas Conservation Commission, taken by Laura Ferro and transcribed by me:

THAT the Transcript has been prepared at the request of the Alaska Oil and Gas Conservation Commission, 333 West Seventh Avenue, Anchorage, Alaska.

DATED at Anchorage, Alaska this 15th day of June, 2004.

SIGNED AND CERTIFIED TO BY:



Jerri Young
Notary in and for Alaska
My Commission Expires: 11/03/07

#5

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TO	Anchorage Daily News P O Box 149001 Anchorage, AK 99514	DATES ADVERTISEMENT REQUIRED: April 22, 2004 THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN. SPECIAL INSTRUCTIONS:	

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STATE OF ALASKA
SUPPLEMENTAL NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment.

This is a SUPPLEMENTAL NOTICE adding to the NOTICE OF PROPOSED CHANGES dated April 16, 2004 concerning these proposed regulations revisions. Except as provided in this supplemental notice, the contents in the AOGCC's notice of April 16, 2004 are incorporated by reference. This supplemental notice is being issued because the AOGCC has changed the date for the oral hearing and has extended the period for receiving written comments.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by submitting written comments to the Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on June 8, 2004.

Oral or written comments also may be submitted at a hearing to be held on June 8, 2004, at the AOGCC offices, 333 W. 7th Avenue, Suite 100, Anchorage, Alaska. The hearing will begin at 9:00 a.m. and might be extended from day to day if necessary to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation, auxiliary aid or service, or alternative communication format in order to participate in the process on the proposed regulation, please contact Jody Colombie at (907) 793-1221 by 4:00 p.m., June 1, 2004, to ensure that any necessary accommodations can be provided.

Statutory Authority: AS 31.05.030
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: April 20, 2004

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

Published: April 22, 2004
AO-02414030

ADDITIONAL REGULATIONS NOTICE INFORMATION
(AS 44.62.190(d))

1. Adopting agency: Alaska Oil and Gas Conservation Commission.

2. General subject of regulations: blowout prevention equipment.

3. Citation of regulations: 20 AAC 25.035 and 25.036.

4. Reason for the proposed action: updating regulatory requirements in light of experience and information.

5. Program category and BRU affected: Alaska Oil and Gas Conservation Commission.

6. Cost of implementation to the state agency: zero.

7. The name of the contact person for the regulations John K. Norman, Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501, (907) 279-1433.

8. The origin of the proposed action: staff.

9. Date: April 16, 2004

10. Prepared by:

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission
(907) 279-1433

Anchorage Daily News
Affidavit of Publication

1001 Northway Drive, Anchorage, AK 99508

4/23/2004

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STATE OF ALASKA
THIRD JUDICIAL DISTRICT

Teresita Peralta, being first duly sworn on oath deposes and says that she is an advertising representative of the Anchorage Daily News, a daily newspaper.

That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on the above dates and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed Teresita Peralta

Subscribed and sworn to me before this date:

April 27, 2004

Notary Public in and for the State of Alaska.
Third Division. Anchorage, Alaska

MY COMMISSION EXPIRES: 09/12/2007

Kimberly A. Kirby

KIMBERLY A. KIRBY
NOTARY
PUBLIC
STATE OF ALASKA
My Commission Expires: Sept. 12, 2007

STATE OF ALASKA
SUPPLEMENTAL NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment.

This is a SUPPLEMENTAL NOTICE adding to the NOTICE OF PROPOSED CHANGES dated April 16, 2004 concerning these proposed regulations revisions. Except as provided in this supplemental notice, the contents in the AOGCC's notice of April 16, 2004 are incorporated by reference. This supplemental notice is being issued because the AOGCC has changed the date for the oral hearing and has extended the period for receiving written comments.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by submitting written comments to the Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on June 8, 2004.

Oral or written comments also may be submitted at a hearing to be held on June 8, 2004, at the AOGCC offices, 333 W. 7th Avenue, Suite 100, Anchorage, Alaska. The hearing will begin at 9:00 a.m. and might be extended from day to day if necessary to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation, auxiliary aid or service, or alternative communication format in order to participate in the process on the proposed regulation, please contact Jody Colombie at (907) 793-1221 by 4:00 p.m., June 1, 2004, to ensure that any necessary accommodations can be provided.

Statutory Authority: AS 31.05.030
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: April 20, 2004
John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

AO-02414030

Publish: April 22, 2004

Subject: Supplemental Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Tue, 20 Apr 2004 16:32:46 -0800
To: undisclosed-recipients:;
BCC: Angela Webb <angie_webb@admin.state.ak.us>, Cynthia B Mciver <bren_mciver@admin.state.ak.us>

Please replace the original Notice with the attached Supplemental Notice. The original notice was e-mailed on 4/16/04. I changed the date of the hearing. The original Additional Regulation Notice Information sheet was not changed, so it can remain as is on line.

I am sorry for the inconvenience.-Jody

BOPE supplement notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Tue, 20 Apr 2004 16:33:48 -0800
To: Legal Ads Anchorage Daily News <legalads@adn.com>

Please publish on 4/22/04. Thank you.

BOPE supplement notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

4

MEMORANDUM

State of Alaska
Department of Law

To: John K. Norman, Chair
Alaska Oil and Gas Conservation Commission
Dept. of Administration

Date: April 20, 2004

File No.: 993-04-0159

Tel. No.: 465-3600

From: Deborah E. Behr
Assistant Attorney General
and Regulations Attorney
Legislation and Regulations Section

Re: Regulations File Opening Re:
Blow Out Prevention Equipment
(20 AAC 25.035; 036)

We have received your memorandum of April 16, 2004 regarding this project, along with a copy of the proposed regulations and related documents. The project has been assigned to Assistant Attorney General Rob Mintz, phone number 269-5100.

Our department's file number for this project is 993-04-0159. This file number should be used on any further correspondence pertaining to this project.

DEB:pvp

cc: Kevin Jardell, Regulations Contact
Dept. of Administration

Jody Colombie
Alaska Oil & Gas Conservation Commission
Dept. of Administration

Robert Pearson, AAC Coordinator
Lt. Governor's Office

Wilson Condon, Supervising Attorney
Oil, Gas, and Mining Section

Rob Mintz
Assistant Attorney General
Anchorage

#3

STATE OF ALASKA
ADVERTISING ORDER

SEE BOTTOM FOR INVOICE ADDRESS

NOTICE TO PUBLISHER

INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NUMBER. CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE

ADVERTISING ORDER NO.

AO-02414029

FROM	AOGCC 333 W 7th Ave, Ste 100 Anchorage, AK 99501 -
TO	Anchorage Daily News P O Box 149001 Anchorage, AK 99514

AGENCY CONTACT	Jody Colombie
PHONE	(907) 793 –1221
DATE OF A.O.	April 16, 2004
PCN	

DATES ADVERTISEMENT REQUIRED:

April 19, 2004

THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN.

SPECIAL INSTRUCTIONS:

STOF0330

Advertisement to be published was e-mailed

Type of Advertisement X **Legal** ☐ **Display** ☐ **Classified** ☐ **Other (Specify)**

SEE ATTACHED

SEND INVOICE IN TRIPLICATE TO	AOGCC, 333 W. 7th Ave., Suite 100 Anchorage, AK 99501	PAGE 1 OF 2 PAGES	TOTAL OF ALL PAGES$	

REF	TYPE	NUMBER	AMOUNT	DATE	COMMENTS
1	VEN				
2	ARD	02910			
3					
4					

FIN	AMOUNT	SY	CC	PGM	LC	ACCT	FY	NMR DIST	NMR LIQ
1		04	02140100			73540			
2									
3									
4									

REQUISITIONED BY: J Colombie

DIVISION APPROVAL:

02-902 (Rev. 3/94) **Publisher/Original Copies: Department Fiscal, Department, Receiving** AO.FRM

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment, including the following:

> 20 AAC 25.035 and 25.036 are proposed to be amended to change the time intervals for testing blowout prevention equipment, change the types of tests required for blowout prevention equipment, and add a requirement that use of blowout prevention equipment to prevent fluid flow from a well be reported to the AOGCC.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by writing to AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on May 27, 2004.

Additionally, oral or written comments may be submitted at a hearing to be held on May 27, 2004, at 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The hearing will begin at 9:00 a.m. and might be extended from day to day if necessary to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation, auxiliary aid or service, or alternative communication format in order to participate in the process on the proposed regulation, please contact Jody Colombie at 793-1221 by 4:00 p.m., May 25, 2004 to ensure that any necessary accommodations can be provided.

Copies of the proposed regulation changes may be obtained from the AOGCC office, 333 W. 7th Avenue, Anchorage, Alaska 99501, or by telephoning the AOGCC at 907-793-1221, or on the AOGCC website at:

http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: April 16, 2004

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

Published: April 19, 2004
AO-02414029

ADDITIONAL REGULATIONS NOTICE INFORMATION
(AS 44.62.190(d))

1. Adopting agency: Alaska Oil and Gas Conservation Commission.

2. General subject of regulations: blowout prevention equipment.

3. Citation of regulations: 20 AAC 25.035 and 25.036.

4. Reason for the proposed action: updating regulatory requirements in light of experience and information.

5. Program category and BRU affected: Alaska Oil and Gas Conservation Commission.

6. Cost of implementation to the state agency: zero.

7. The name of the contact person for the regulations John K. Norman, Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501, (907) 279-1433.

8. The origin of the proposed action: staff.

9. Date: April 16, 2004

10. Prepared by:

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission
(907) 279-1433

Anchorage Daily News
Affidavit of Publication

1001 Northway Drive, Anchorage, AK 99508

4/21/2004

AD #	DATE	PO	ACCOUNT	PRICE PER DAY	OTHER CHARGES	OTHER CHARGES #2	OTHER CHARGES #3	OTHER CHARGES #4	OTHER CHARGES #5	GRAND TOTAL
131039	04/19/2004	02414029	STOF0330	$221.92						
				$221.92	$0.00	$0.00	$0.00	$0.00	$0.00	$221.92

STATE OF ALASKA
THIRD JUDICIAL DISTRICT

Teresita Peralta, being first duly sworn on oath deposes and says that she is an advertising representative of the Anchorage Daily News, a daily newspaper.

That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on the above dates and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed Teresita Peralta

Subscribed and sworn to me before this date:

April 26, 2004

Notary Public in and for the State of Alaska.
Third Division. Anchorage, Alaska

MY COMMISSION EXPIRES: 09/12/2007

Kimberly A. Kirby

KIMBERLY A. KIRBY
NOTARY
PUBLIC
STATE OF ALASKA
My Commission Expires Sept. 12, 2007

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN
THE REGULATIONS OF THE
ALASKA OIL AND GAS
CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment, including the following:

20 AAC 25.035 and 25.036 are proposed to be amended to change the time intervals for testing blowout prevention equipment, change the types of tests required for blowout prevention equipment, and add a requirement that use of blowout prevention equipment to prevent fluid flow from a well be reported to the AOGCC.

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Additionally, oral or written comments may be submitted at a hearing to be held on May 27, 2004, at 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The hearing will begin at 9:00 a.m. and might be extended from day to day if necessary to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

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http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: April 16, 2004
John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

AO-02414029
Publish: April 19, 2004

STATE OF ALASKA
ADVERTISING ORDER

SEE BOTTOM FOR INVOICE ADDRESS

NOTICE TO PUBLISHER

INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NUMBER. CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE

ADVERTISING ORDER NO.

AO-02414029

FROM	AOGCC 333 West 7th Avenue, Suite 100 Anchorage, AK 99501 907-793-1221	**AGENCY CONTACT** Jody Colombie PHONE (907) 793 -1221	**DATE OF A.O.** April 16, 2004 PCN
TO	Anchorage Daily News P O Box 149001 Anchorage, AK 99514	**DATES ADVERTISEMENT REQUIRED:** April 19, 2004 **THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN.** **SPECIAL INSTRUCTIONS:**	

AFFIDAVIT OF PUBLICATION

United states of America

State of _____ ss

_____ division.

Before me, the undersigned, a notary public this day personally appeared

_____ who, being first duly sworn, according to law, says that

he/she is the _____ of _____

Published at _____ in said division _____and

state of _____ and that the advertisement, of which the annexed

is a true copy, was published in said publication on the _____ day of

_____ 2004, and thereafter for ____ consecutive days, the last

publication appearing on the _____ day of _____,2004, and that

the rate charged thereon is not in excess of the rate charged private

individuals.

Subscribed and sworn to before me

This ____ day of _____ 2004,

_____

Notary public for state of _____

My commission expires _____

REMINDER

INVOICE MUST BE IN TRIPLICATE AND MUST REFERENCE THE ADVERTISING ORDER NUMBER.

A CERTIFIED COPY OF THIS AFFIDAVIT OF PUBLICATION MUST BE SUBMITTED WITH THE INVOICE.

ATTACH PROOF OF PUBLICATION HERE.

Subject: Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Fri, 16 Apr 2004 15:05:11 -0800
To: Legal Ads Anchorage Daily News <legalads@adn.com>

Please publish on Monday

Notice of 14 Day BOPE Test.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: RE: Ad Order
From: legalads <legalads@adn.com>
Date: Fri, 16 Apr 2004 16:07:38 -0800
To: Jody Colombie <jody_colombie@admin.state.ak.us>

Hi Jody:
Thanks for the AO, Following is the confirmation information on your legal notice. Please let me know if you have any questions or need additional information.

Account Number: STOF 0330
Legal Ad Number: 131039
Publication Date(s): April 19, 2004
Your Reference or PO#: 02414029
Cost of Legal Notice: $221.92
Additional Charges
Web Link:
E-Mail Link:
Bolding:
Total Cost to Place Legal Notice: $221.92

Ad Will Appear on the web, www.adn.com:
Ad Will Not Appear on the web, www.adn.com: XXXX

Thank You,
Kim Kirby
Anchorage Daily News
Legal Classified Representative
E-Mail: legalads@adn.com
Phone: (907) 257-4296
Fax: (907) 279-8170

From: Jody Colombie
Sent: Friday, April 16, 2004 3:53 PM
To: legalads
Subject: Ad Order

<<File: Ad Order form.doc>>

Kim, I'm sorry! -Jody

Subject: Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Fri, 16 Apr 2004 15:02:51 -0800
To: Cynthia B Mciver <bren_mciver@admin.state.ak.us>

Please publish on line

Notice_BOPE Test.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Notice of 14 Day BOPE Test.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Public Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Fri, 16 Apr 2004 15:02:11 -0800
To: Angela Webb <angie_webb@admin.state.ak.us>

Please publish on line.

Notice of 14 Day BOPE Test.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Regulation Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Fri, 16 Apr 2004 15:18:39 -0800
To: undisclosed-recipients:;
BCC: Robert E Mintz <robert_mintz@law.state.ak.us>, Christine Hansen <c.hansen@iogcc.state.ok.us>, Terrie Hubble <hubbletl@bp.com>, Sondra Stewman <StewmaSD@BP.com>, Scott & Cammy Taylor <staylor@alaska.net>, stanekj <stanekj@unocal.com>, ecolaw <ecolaw@trustees.org>, roseragsdale <roseragsdale@gci.net>, trmjr1 <trmjr1@aol.com>, jbriddle <jbriddle@marathonoil.com>, rockhill <rockhill@aoga.org>, shaneg <shaneg@evergreengas.com>, , jdarlington <jdarlington@forestoil.com>, nelson <nelson@gci.net>, cboddy <cboddy@usibelli.com>, Mark Dalton <mark.dalton@hdrinc.com>, Shannon Donnelly <shannon.donnelly@conocophillips.com>, "Mark P. Worcester" <mark.p.worcester@conocophillips.com>, "Jerry C. Dethlefs" <jerry.c.dethlefs@conocophillips.com>, Bob <bob@inletkeeper.org>, wdv <wdv@dnr.state.ak.us>, tjr <tjr@dnr.state.ak.us>, bbritch <bbritch@alaska.net>, mjnelson <mjnelson@purvingertz.com>, Charles O'Donnell <charles.o'donnell@veco.com>, "Randy L. Skillern" <SkilleRL@BP.com>, "Jeanne H. Dickey" <DickeyJH@BP.com>, "Deborah J. Jones" <JonesD6@BP.com>, "Paul G. Hyatt" <hyattpg@BP.com>, "Steven R. Rossberg" <RossbeRS@BP.com>, Lois <lois@inletkeeper.org>, "Joseph F. Kirchner" <KirchnJF@BP.com>, Gordon Pospisil <PospisG@BP.com>, "Francis S. Sommer" <SommerFS@BP.com>, Mikel Schultz <Mikel.Schultz@BP.com>, "Nick W. Glover" <GloverNW@BP.com>, "Daryl J. Kleppin" <KleppiDE@BP.com>, "Janet D. Platt" <PlattJD@BP.com>, "Rosanne M. Jacobsen" <JacobsRM@BP.com>, ddonkel <ddonkel@cfl.rr.com>, Collins Mount <collins_mount@revenue.state.ak.us>, mckay <mckay@gci.net>, Barbara F Fullmer <barbara.f.fullmer@conocophillips.com>, bocastwf <bocastwf@bp.com>, Charles Barker <barker@usgs.gov>, , doug_schultze <doug_schultze@xtoenergy.com>, Hank Alford <hank.alford@exxonmobil.com>, Mark Kovac <yesno1@gci.net>, gspfoff <gspfoff@aurorapower.com>, Gregg Nady <gregg.nady@shell.com>, Fred Steece <fred.steece@state.sd.us>, rcrotty <rcrotty@ch2m.com>, jejones <jejones@aurorapower.com>, dapa <dapa@alaska.net>, jroderick <jroderick@gci.net>, eyancy <eyancy@seal-tite.net>, "James M. Ruud" <james.m.ruud@conocophillips.com>, Brit Lively <mapalaska@ak.net>, jah <jah@dnr.state.ak.us>, Kurt E Olson <kurt_olson@legis.state.ak.us>, buonoje <buonoje@bp.com>, Mark Hanley <mark_hanley@anadarko.com>, loren_leman <loren_leman@gov.state.ak.us>, Harry R Bader <harry_bader@dnr.state.ak.us>, Julie Houle <julie_houle@dnr.state.ak.us>, John W Katz <jwkatz@sso.org>, Suzan J Hill <suzan_hill@dec.state.ak.us>, tablerk <tablerk@unocal.com>, Brady <brady@aoga.org>, Brian Havelock <beh@dnr.state.ak.us>, bpopp <bpopp@borough.kenai.ak.us>, Jim White <jimwhite@satx.rr.com>, "John S. Haworth" <john.s.haworth@exxonmobil.com>, marty <marty@usalaska.biz>, ghammons <ghammons@aol.com>, rmclean <rmclean@pobox.alaska.net>, , James Scherr <james.scherr@mms.gov>, mkm7200 <mkm7200@aol.com>

additional regulation changes.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Notice of 14 Day BOPE Test.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Citgo Petroleum Corporation
PO Box 3758
Tulsa, OK 74136

Mary Jones
XTO Energy, Inc.
Cartography
810 Houston Street, Ste 2000
Ft. Worth, TX 76102-6298

David McCaleb
IHS Energy Group
GEPS
5333 Westheimer, Ste 100
Houston, TX 77056

Kelly Valadez
Tesoro Refining and Marketing Co.
Supply & Distribution
300 Concord Plaza Drive
San Antonio, TX 78216

Robert Gravely
7681 South Kit Carson Drive
Littleton, CO 80122

George Vaught, Jr.
PO Box 13557
Denver, CO 80201-3557

Jerry Hodgden
Hodgden Oil Company
408 18th Street
Golden, CO 80401-2433

Richard Neahring
NRG Associates
President
PO Box 1655
Colorado Springs, CO 80901

John Levorsen
200 North 3rd Street, #1202
Boise, ID 83702

Kay Munger
Munger Oil Information Service, Inc
PO Box 45738
Los Angeles, CA 90045-0738

Samuel Van Vactor
Economic Insight Inc.
3004 SW First Ave.
Portland, OR 97201

Michael Parks
Marple's Business Newsletter
117 West Mercer St, Ste 200
Seattle, WA 98119-3960

Mark Wedman
Halliburton
6900 Arctic Blvd.
Anchorage, AK 99502

Schlumberger
Drilling and Measurements
3940 Arctic Blvd., Ste 300
Anchorage, AK 99503

Baker Oil Tools
4730 Business Park Blvd., #44
Anchorage, AK 99503

Ciri
Land Department
PO Box 93330
Anchorage, AK 99503

Jill Schneider
US Geological Survey
4200 University Dr.
Anchorage, AK 99508

Gordon Severson
3201 Westmar Cr.
Anchorage, AK 99508-4336

David Cusato
600 West 76th Ave., #508
Anchorage, AK 99518

Jack Hakkila
PO Box 190083
Anchorage, AK 99519

Darwin Waldsmith
PO Box 39309
Ninilchick, AK 99639

James Gibbs
PO Box 1597
Soldotna, AK 99669

Kenai National Wildlife Refuge
Refuge Manager
PO Box 2139
Soldotna, AK 99669-2139

Penny Vadla
399 West Riverview Avenue
Soldotna, AK 99669-7714

Richard Wagner
PO Box 60868
Fairbanks, AK 99706

Cliff Burglin
PO Box 70131
Fairbanks, AK 99707

Bernie Karl
K&K Recycling Inc.
PO Box 58055
Fairbanks, AK 99711

Williams Thomas
Arctic Slope Regional Corporation
Land Department
PO Box 129
Barrow, AK 99723

North Slope Borough
PO Box 69
Barrow, AK 99723

mailed 4/19/04

Subject: Supplemental Notice
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Tue, 20 Apr 2004 16:44:09 -0800
To: undisclosed-recipients:;
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Additional Regulation Notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

BOPE supplement notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

#2

MEMORANDUM STATE OF ALASKA

ALASKA OIL AND GAS CONSERVATION COMMISSION

TO: Deborah E. Behr
Assistant Attorney General
And Regulations Attorney
Legislation and Regulations Section

DATE: April 16, 2004

SUBJECT: File-opening request for new regulations project on blow out prevention equipment

FROM: John K. Norman, Chair
Commissioner

We are requesting that you open a new file for a regulations project regarding changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blow out prevention equipment.

Enclosed is a copy of the public notice, Additional Regulations Notice Information, and a draft of the regulation.

Please assign Assistant Attorney General Robert Mintz to this project. Our contact person for the project is Jody Colombie at 793-1221.

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with blowout prevention equipment, including the following:

> 20 AAC 25.035 and 25.036 are proposed to be amended to change the time intervals for testing blowout prevention equipment, change the types of tests required for blowout prevention equipment, and add a requirement that use of blowout prevention equipment to prevent fluid flow from a well be reported to the AOGCC.

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by writing to AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on May 27, 2004.

Additionally, oral or written comments may be submitted at a hearing to be held on May 27, 2004, at 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The hearing will begin at 9:00 a.m. and might be extended from day to day if necessary to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation, auxiliary aid or service, or alternative communication format in order to participate in the process on the proposed regulation, please contact Jody Colombie at 793-1221 by 4:00 p.m., May 25, 2004 to ensure that any necessary accommodations can be provided.

Copies of the proposed regulation changes may be obtained from the AOGCC office, 333 W. 7th Avenue, Anchorage, Alaska 99501, or by telephoning the AOGCC at 907-793-1221, or on the AOGCC website at:

http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: April 16, 2004

John K. Norman, Chair
Alaska Oil and Gas Conservation Commission

Published: April 19, 2004
AO-02414029

20 AAC 25.035 (e)(10) is repealed and readopted and a new paragraph is added to read.

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit

to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE pressure test must be provided so that a commission representative can witness the test;

(11) instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of use.

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read.

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including emergency valves, and choke manifolds, must be pressure tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that if testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(4) if BOP sealing ram type equipment has been used, it must be pressure tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided so that a representative of the commission can witness the test.

. . .

(g) Instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of use.

#1

20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE function pressure test must be provided to the

commission so that a commission representative can witness the test;

(11) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent

of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) The operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.035 (e)(10) is repealed and readopted and a new paragraph is added to read ~~as follows~~.

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE pressure test must be provided so that a commission representative can witness the test.;

(11) ~~I~~instances of BOPE use to prevent the flow of fluids from a well must be reported to the c~~C~~ommission within 24 hours of use.

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read ~~as follows~~.

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including emergency valves, and choke manifolds, must be pressure tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that if testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(4) if BOP sealing ram type equipment has been used, it must be pressure tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

(6) test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours notice of each function pressure test must be provided so that a representative of the commission can witness the test.

(~~g~~e) Instances of BOPE use to prevent the flow of fluids from a well must be reported to the ~~Commission~~ commission within 24 hours of use.

~~20 AAC 25.036 (e) and (f) are repealed and readopted as (f) and (g).~~

20 AAC 25.035 (e)(10) is repealed and readopted and a new paragraph is added to read.

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be

performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours notice of each BOPE pressure test must be provided so that a commission representative can witness the test;

(11) instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of use.

20 AAC 25.036(d) is repealed and readopted and a new subsection is added to read.

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including emergency

valves, and choke manifolds, ~~must~~ shall be pressure tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment ~~must~~ shall be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that ~~if testing against the~~ an annular type preventer~~, pressure testing~~ need not ~~exceed~~ be tested to more than 50 percent of ~~the~~ its rated working pressure ~~of the annular type preventer~~;

(4) if BOP sealing ram type equipment has been used, it ~~must~~ shall be pressure tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams ~~must~~ shall be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing ~~must~~ shall be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams ~~must~~ shall be function tested at least every thirty days;

(6) test results ~~must~~ shall be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours prior notice of each function pressure test ~~must~~ shall be provided to the commission so that a representative of the commission can witness the test.

. . .

(g) Instances of BOPE use to prevent the flow of fluids from a well ~~must~~ shall be reported to the commission within 24 hours of such use. . (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.035 (e)(10) is repealed and readopted and a new paragraph is added to read.

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a well classified as "development" or "service", and unless the Commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit

to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

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(F) at least 24 hours notice of each BOPE pressure test must be provided so that a commission representative can witness the test;

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(2) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test", and at least once a week thereafter, BOPE, including emergency valves, and choke manifolds, must be pressure tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that if testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(4) if BOP sealing ram type equipment has been used, it must be pressure tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function tested at least every thirty days;

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20 AAC 25.035(e)(10) is repealed and readopted and a new paragraph is added to read:

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(A) when installed, repaired, or changed on a well classified as "development" or "service" and, unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(B) when installed, repaired, or changed on a well classified as "exploratory" or "stratigraphic test" and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components exclusive of blind rams must be function-tested weekly and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function-tested at least every thirty days;

(E) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1);

(F) at least 24 hours prior notice of each BOPE pressure test shall be provided to the

commission so that a commission representative can witness the test;

(11) instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of use.

(Eff. 4/13/80, Register 74; am 2/22/81, register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am ____/____/_____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036 (d) is repealed and readopted and a new subsection is added to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a well classified as "development" or "service" and. unless the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance, at time intervals not to exceed each fourteen days thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

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(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP sealing ram type equipment has been used, it must be pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its

rated working pressure;

(5) BOP ram and annular components exclusive of blind rams must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing shall be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP; blind rams must be function-tested at least every thirty days;

(6) test results shall be recorded as part of the daily record required by 20 AAC 25.070(1);

(7) at least 24 hours prior notice of each function pressure-test shall be provided to the commission so that a representative of the commission can witness the test.

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(g) Instances of BOPE use to prevent the flow of fluids from a well must be reported to the commission within 24 hours of such use. (Eff. 11/7/99, Register 152; am ____/____/_____, Register ____)

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